

# **EXHIBIT 1**

**From:** [McEnany, John \(USANYS\)](#)  
**To:** [Crowley, Shawn \(USANYS\)](#); [Bove, Emil \(USANYS\)](#); [Kim, Elizabeth \(USANYS\)](#); [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#)  
**Cc:** [Graff, Ilan \(USANYS\)](#)  
**Subject:** Sadr Telephone Records—Oversight and Correction  
**Date:** Thursday, October 15, 2020 11:03:06 AM  
**Attachments:** [SA Smyth Timeline.xlsx](#)

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Following up on a couple points that were raised with me in the last few days, I asked S/A Sean Smyth to review the telephone records. As a result I have one amplification and one correction to make to the recitation I set forth in my July 2, 2020, letter to the Court.

1. On page 11 of that letter, in the bottom paragraph, I describe a conference call the morning of Saturday, March 7, 2020, between AUSAs Lake, Kim and Krouse. I neglected to mention that during that conference call, which began at approximately 9:23 a.m., and which lasted for 26 minutes, SAUSA Lynch called AUSA Lake at approximately 9:24 a.m. That call went straight to voicemail; but at approximately 9:39 a.m. SAUSA Lynch called AUSA Lake again and was joined into the conference call for its remaining 10 minutes.

2. At pages 14-15 of the letter, I state “At 9:53 p.m., Chiefs Crowley and Bove called AUSA Krouse. Mobile phone records indicate this call lasted until 9:59 p.m., one minute before the Court’s deadline.” However, as reflected on the spreadsheet S/A Smyth prepared, there were multiple calls during the period 9:51 p.m. and 9:59 p.m. Specifically, at 9:51 p.m. Chief Bove called Chief Crowley; and at approximately 9:52 p.m. Chief Crowley conferred AUSA Krouse into that call, which continued for up to one minute. At 9:53 p.m. Chief Bove initiated a separate call to Chief Crowley, which lasted for up to six minutes.

For more detail regarding those two calls I have attached the spreadsheet S/A Smyth prepared. You may of course reference this updated information as may be pertinent to your declarations. We will also reference this update in the October 30 filing the Court has authorized us to make.

-John

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**John M. McEnany**

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United States Attorney’s Office  
Southern District of New York  
One St. Andrew’s Plaza  
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## Sheet1

Date	Time	Event	Additional Record indicators	Agent Notes
03/07/20	09:23:00 AM	Stephanie Lake initiates conference call with Michael Krouse and Jane Kim. Call lasts 26 minutes	Conf Call indicator	
03/07/20	09:24:00 AM	Stephanie Lake receives a call from Garrett Lynch (duration 1 min) which went to Voicemail	Went to V/M	Note 26 minute call still in progress
03/07/20	09:39:00 AM	Stephanie Lake receives a call from Garrett Lynch duration 10 minutes	Call Waiting indicator	Note 26 minute call still in progress, Lynch joins conference call to the end
03/08/20	09:51:00 PM	Emil Bove (personal cell) calls Shawn Crowley. Call lasts 3 minutes	Conf Call indicator	
03/08/20	09:52:00 PM	Shawn Crowley calls Michael Krouse. Call lasts 1 minute	Conf Call indicator	Note becomes conference call between Crowley, Bove and Krouse
03/08/20	09:53:00 PM	Emil Bove (work cell) calls Shawn Crowley. Call lasts 6 minutes		
03/08/20	09:59:00 PM	Shawn Crowley calls Stephanie Lake. Call lasts 5 minutes		

[Note durations are “up to” time indicated. For example, a duration of 3 minutes could indicate a call lasting anywhere from 2 minutes and 1 second to 3 minutes]

## **EXHIBIT 2**

### **Crowley/Lake Chats – March 7, 2020**

[. . .]

Crowley, Shawn (USANYS) 5:30 PM:

let me guess. you wrote part 1 of this letter and jane wrote part 2?

Stephanie L. . Lake 5:35 PM:

nope

she wrote it all

i'm behind on these complicated summary charts for monday, and she finished a draft of the rebuttal, so  
she

just finished it

oh and also behind on being accused of brady violations

or ahead?

Crowley, Shawn (USANYS) 5:36 PM:

stephanie. what the actual fuck

i am a chief of the unit

i am allowed to ask questions  
about a trial that is happening

Stephanie L. . Lake 5:36 PM:

NOOOOO

not you

defense

i'm telling you what they just did

because you are chief of the unit

Crowley, Shawn (USANYS) 5:37 PM:

ha ok sorry

what did they do

Stephanie L. . Lake 5:37 PM:

they accused us of a brady violation (again)

i'll just come explain. as long as you promise not to use my full name / yell at me.

Crowley, Shawn (USANYS) 5:37 PM:

Ok

[. . .]

Crowley, Shawn (USANYS) 5:41 PM:

i'm prob gonna leave in like 10 mins if you want to talk

### **Crowley/Lake Chats – March 8, 2020**

[. . . .]

Crowley, Shawn (USANYS) 2:17 PM:

no

can we talk about the brady thing at some point?

Stephanie L. . Lake 2:17 PM:

which brady thing?

Crowley, Shawn (USANYS) 2:18 PM:

yesterday you said they accused you of a brady violation?

Stephanie L. . Lake 2:18 PM:

oh, yeah. i explained it to emil

we're supposed to have a call with defense at 2:30

i can fill you in before if you want

[. . . .]

Crowley, Shawn (USANYS) 2:23 PM:  
ok can we talk about the brady thing?

Stephanie L. . Lake 2:23 PM:

yeah

too logn to type

Crowley, Shawn (USANYS) 2:24 PM:

are you here?

[. . .]

Stephanie L. . Lake 5:25 PM:

unrelatedly

i think this all goes to a defense they're supposed to be precluded from making  
which is that the banks were negligent in not figuring this stuff out

Crowley, Shawn (USANYS) 5:26 PM:

ok i think we should mention that in the materiality part of hte letter

Crowley, Shawn (USANYS) 5:48 PM:

can you swing by?

Stephanie L. . Lake 5:49 PM:

i'm furiously writing this thing

Crowley, Shawn (USANYS) 5:49 PM:

i know we have an idea

Stephanie L. . Lake 5:49 PM:

i can, but i'm worried about getting it done

okay

Stephanie L. . Lake 5:55 PM:

can you send me the schulte letter?

did it have law?

Crowley, Shawn (USANYS) 6:05 PM:

sorry let me see

# **EXHIBIT 3**

3:41

LTE

Emil >

Stephanie called (!! ) and I just talked it through. She wanted to talk to the team first thing in the am, and I said fine. That was weak of me but she seemed pretty tired and I didn't want to compound my earlier email.

10:17 PM

She also mentioned that the defense accused them of a Brady violation based on a bank letter they turned over today. Did they come up with you?

10:19 PM

-that

10:19 PM

Not weak.

10:19 PM

Oh god. No

10:19 PM

She said they can't understand how it's exculpatory and they said it was "self evident" why. But no filing yet and maybe/hopefully standing down.

10:20 PM

But yeah I almost fell over

10:20 PM

These guys do seem like assholes. Hopefully it's just that...?

10:20 PM

Yeah I am praying

10:21 PM



iMessage



# **EXHIBIT 4**

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** [Crowley, Shawn \(USANYS\)](#); [Bove, Emil \(USANYS\)](#); [Lake, Stephanie \(USANYS\)](#); [Kim, Jane \(USANYS\)](#) 4; [Garrett Lynch](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** Defense letter re curative instruction  
**Date:** Sunday, March 08, 2020 4:03:52 PM  
**Attachments:** [Defense letter re curative instruction \(March 8, 2020\).pdf](#)

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This is what they filed.

Michael Krouse  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
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March 8, 2020

By ECF

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

On behalf of Defendant Ali Sadr Hashemi Nejad, we write to request a curative instruction. We have conferred with the government who stated that it opposes this request.

On Saturday afternoon around 4:00 p.m., the government produced GX 411 (attached as Exhibit A), which had not been previously disclosed to the defense. GX 411 reveals that in connection with the first U.S. dollar payment in this case, the intermediary bank wrote a letter to OFAC disclosing certain information about the transactions. Among other things, the intermediary bank disclosed to OFAC that Stratus Turkey (Stratus International Contracting J.S.) was affiliated with Stratus Iran (Stratus International Contracting Company) and implied that the two companies were either unitary or cooperating on the Ojeda project in Venezuela. The intermediary bank attached Stratus Iran's website describing its ongoing work on the Ojeda project. The intermediary bank concluded that this information was not subject to mandatory disclosure as indicated by its note that it was "voluntarily informing OFAC." The government has not produced any response from OFAC and to defense counsel's knowledge, no response exists. *Cf.* Tr. 580, Test. of Ted Kim (Mar. 5, 2020) (agreeing that to his knowledge, "this matter was never investigated by OFAC").

GX 411 is exculpatory evidence that:

- Stratus Turkey's affiliation with Stratus Iran was not material either to OFAC or the intermediary banks;
- intermediary banks conducted independent investigation and could easily identify the affiliation between Stratus Turkey and Stratus Iran or even (erroneously)

The Honorable Alison J. Nathan  
March 8, 2020  
Page 2

conclude that the two companies were a single entity that “may be an Iranian company”; and

- neither the intermediary bank nor OFAC deemed the disparities in information about the two Stratus International Contractings working on the Ojeda project as important enough to stop U.S. dollar payments to Stratus International Contracting J.S.

The government should have disclosed GX 411 under *Brady*, *Giglio*, and Rule 16.

In light of the government’s failure to disclose this evidence before trial,<sup>1</sup> the defense respectfully requests a curative instruction. Based on a similar mid-trial disclosure in *United States v. Slough*, Judge Lamberth issued the curative instruction attached as Exhibit B. The defense has pasted that instruction below, edited only to reflect the facts of this case:

Government Exhibit 411 is a June 2011 letter regarding an April 2011 transaction involving Stratus International Contracting Company. You saw that evidence this morning instead of earlier in trial because the government failed to turn it over before trial as required by law. The defendant learned of that evidence on Saturday afternoon when the government disclosed it.

Tr. 6, *United States v. Slough*, No. 08-cr-360-RCL (D.D.C. Aug. 5, 2014) (relevant text highlighted in Ex. B). The defense requests that this instruction be read to the jury on Monday after GX 411 is admitted. The government opposes this request but does not object to the defense admitting this document in its case if the government chooses not to offer it.

Respectfully submitted,

/s/ Brian M. Heberlig

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rweingarten@steptoe.com

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<sup>1</sup> The government represents that it learned of this evidence in mid-January 2020 and that it came from an unrelated DANY investigation. The government states that it believed this document was part of the Commerzbank subpoena return that was produced in discovery. It was not.

The Honorable Alison J. Nathan  
March 8, 2020  
Page 3

Steptoe

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Bruce C. Bishop (*Pro Hac Vice*)  
David M. Fragale  
Nicholas P. Silverman (*Pro Hac Vice*)  
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*Counsel for Defendant Ali Sadr Hashemi Nejad*

cc: Counsel of Record (via ECF)

# **EXHIBIT 5**

**From:** [Krouse, Michael \(USANYS\)](#)  
**To:** Crowley, Shawn (USANYS); Bove, Emil (USANYS); Lake, Stephanie (USANYS); Kim, Jane (USANYS) 4; Garrett Lynch; Lynch, Garrett (USANYS) [Contractor]  
**Subject:** RE: Defense letter re curative instruction  
**Date:** Sunday, March 08, 2020 4:06:40 PM  
**Attachments:** [GX 411.pdf](#)

---

**From:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Sent:** Sunday, March 8, 2020 4:04 PM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Subject:** RE: Defense letter re curative instruction

Thanks. Can you send us the document itself?

---

**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Sent:** Sunday, March 08, 2020 4:04 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Garrett Lynch <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** Defense letter re curative instruction

This is what they filed.

Michael Krouse  
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(212) 637-2279



NEW YORK BRANCH

Department of the Treasury  
Office of Foreign Assets Control  
1500 Pennsylvania Avenue NW  
Washington DC 20220

Vinay Jepal  
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Telephone (212) 266-7200  
Fax (212) 266-7235  
[vinay.jepal@commerzbank.com](mailto:vinay.jepal@commerzbank.com)

June 16, 2011

**Re: Information Sharing – Stratus International Contracting Company**

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller

Board of Managing Directors: Martin Blessing (Chairman),

Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,

Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main

Registered Office: Frankfurt am Main Reg.No. 32000

VAT No. DE 114 103 514

**COMMERZBANK** 

NEW YORK BRANCH

**Re: Information Sharing – Stratus International Contracting Company– Page 2**

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG  
New York Branch



Deepa Keswani  
Head of AML/Anti-Fraud/Sanctions Compliance



Vinay Jepal  
Sanctions Compliance Officer

Encls.

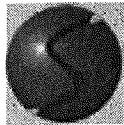
stratus intl payment

:LT Address :COBAUS3XA  
:transaction type :202 COVER bank tfr favour 3rd bank  
:input from :COBADEFF  
COMMERZBANK AG FRANKFURT  
HEAD OFFICE  
32-36 NEUE MAINZERSTRASSE  
60261 FRANKFURT GERMANY  
:validation Flag :COV}

{4: Text block:

:20 /transaction reference number :FAAS109400150500  
:21 /related reference :FAAS109400150500  
:32A/value date :040411 USD 29,442,967.57  
:52A/ordering institution - BIC :COBADEFF  
COMMERZBANK AG  
FRANKFURT AM MAIN  
:57A/account with inst - BIC :CHASUS33  
JPMORGAN CHASE BANK, N.A.  
NEW YORK, NY  
:58A/beneficiary inst - BIC :SHHBCHZZ  
HYPOSWISS PRIVATBANK AG, ZURICH  
ZURICH  
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BT/ FIDEICOMISO / FONDO CHINO  
VENEZOLANO. AV GUICAIPURO. URB EL  
ROSAL. TORRE BANCO DEL TESORO.  
CARACAS - VENEZUELA.  
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BANCO DEL TESORO, C.A. BANCO  
UNIVERSAL  
CARACAS  
:59 /beneficiary customer :/CH7708530519663100203  
STRATUS INTERNATIONAL CONTRACTING  
J.S.  
:70 /details of payment :REF: DESEMBOLSO NRO. 386 FONDO  
CHINO VENEZOLANO. CODIGO NRO.  
00579.  
:33B/amount :USD 29,442,967.57}

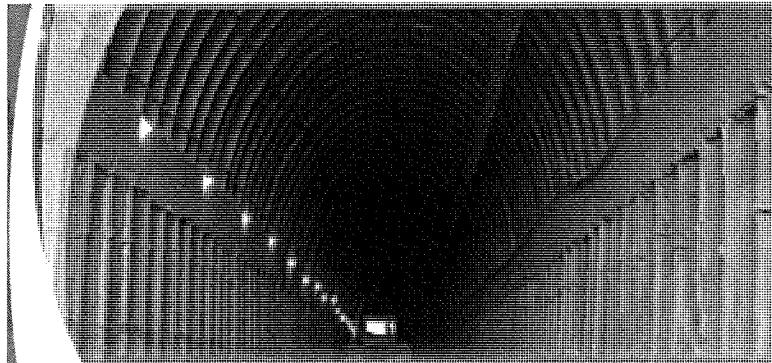
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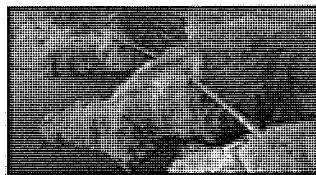
STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



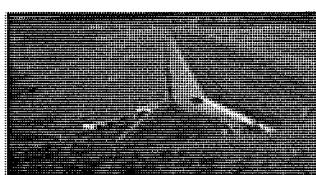
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.  
STRATUS is Graded in three major categories: [Read more...](#)
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
  - Federation of Contractors of Islamic Countries (F.C.I.C.)
  - Pakistan Engineering Council
  - International Chamber of Commerce (I.C.C.)
  - Iran – UK Chamber of Commerce
  - Iran – Canada Chamber of Commerce [Read more...](#)

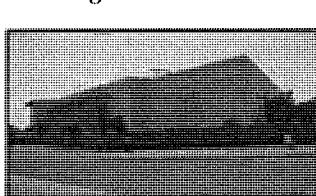
*Road & Railway*



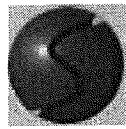
*Dam*



*Building*



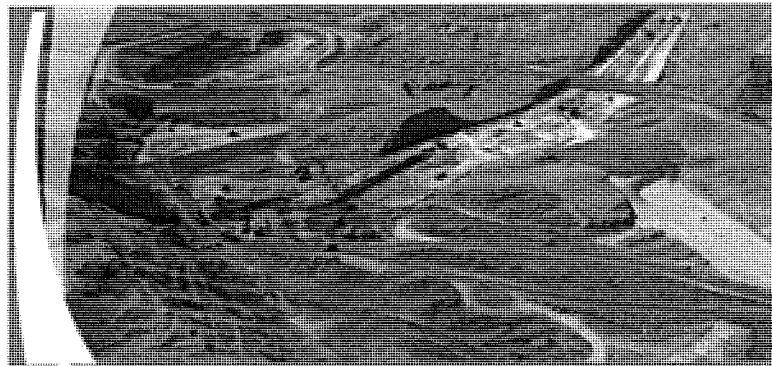
Contact



**Stratus International**  
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



---

**Contact Us**

---

**STRATUS International Contracting Co.**

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

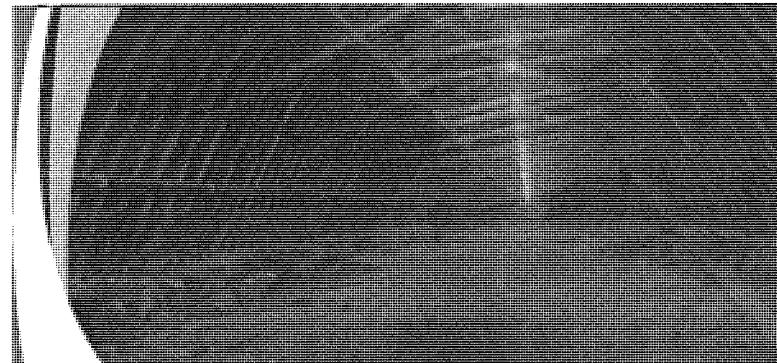
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#### Branch Offices

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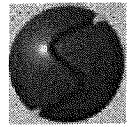
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Iran  
Iraq

**CIS**  
Kazakhstan

**South America**  
Venezuela

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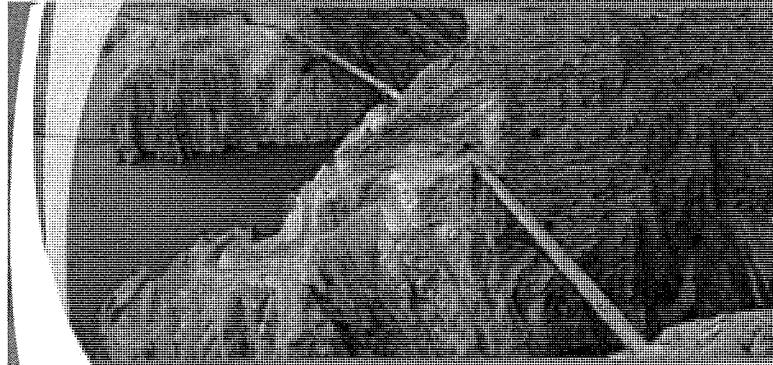
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**Stratus International**  
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



#### Sister Companies List



1. Samaneh Stratus (INVESTMENT CO.)



2. Iran Construction Investment Co.



3. Eghtesad - Novin Bank

4. Pishgaman Bazar Novin (BROKERAGE CO.)



5. Novin Insurance Co.



6. Pars Shahr Co.



7. Global Petro Tech CO.



8. Keyhan Tabadol Co.



9. Pars Hanza Aluminium CO.



10. Azarbaijan Industry Development Co.

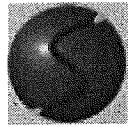
11. Eghtesad Novin Investment CO.



12. Samaneh Gostar Novin

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**Stratus International**  
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.

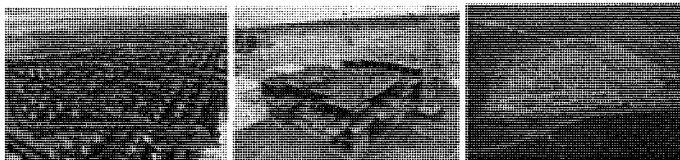


### 7000 Units 'New Ojeda' Housing Development Project

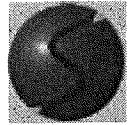
**Main Technical Features**

Site Gross Area : 318 Hec.  
 Concrete works : 520,000 m<sup>3</sup>  
 Net Construction Area : 850.000 m<sup>2</sup>  
 Water & Sewage network : 150 Km  
 Electrical network : 200 Km  
 Communication network : 220 Km  
 Gas network : 30 Km

**Location** Ciudad Ojeda, Zulia State, Venezuela  
**Employer** Ducolsa 'Urban Development S.A'  
**Contract Duration** 48 Months  
**Date of Award** September 2009  
**Status** [ Under Construction ]



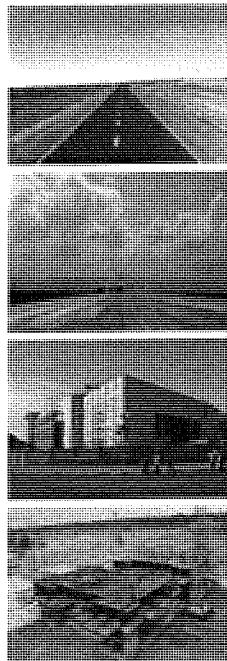
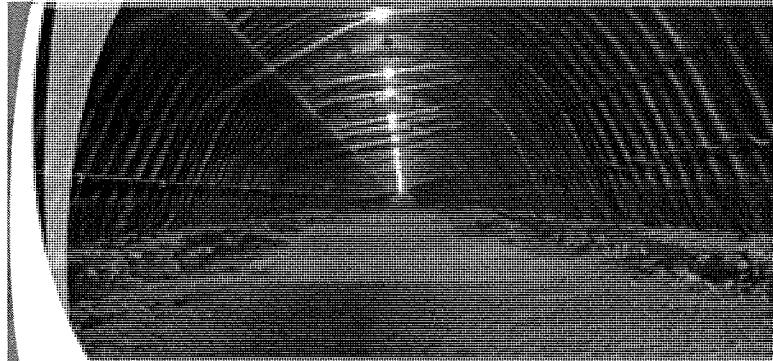
[Back to list]



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Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



**Dalbandin – Nokkundi Highway - Section III-B**

[Details >>](#)

**Socotra Airport**

[Details >>](#)

**Design & Construction of Parliament Building & Commercial Center in Djibouti City**

[Details >>](#)

**7000 Units "New Ojeda" Housing Development Project**

[Details >>](#)

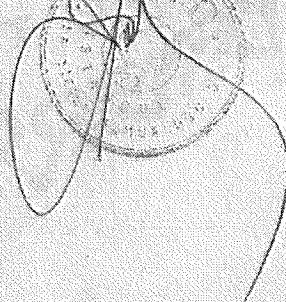
Copyright © 2010 Stratus Group Company. All rights reserved



(KADIKÖY)  
370857 - 2010T.C.  
İSTANBUL  
Ticaret Sicil Memurluğu

## SİCİL TASDIK NAMESİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükümlü şahsin mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICİBAŞI
Tasdknamenin düzenlenenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN  
İSTANBUL TİCARET SİCİLİ  
MEMURU YARDIMCISI

# **EXHIBIT 6**

---

**From:** [Bove, Emil \(USANYS\)](#)  
**To:** [Krouse, Michael \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#); [Lake, Stephanie \(USANYS\)](#); [Kim, Jane \(USANYS\)](#) 4  
**Subject:** RE: Defense letter re curative instruction  
**Date:** Sunday, March 08, 2020 4:16:12 PM

---

Thanks. I dropped Garrett from this. Can we please have the full thread with the January transmittal email + attachment?

---

**From:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Sent:** Sunday, March 8, 2020 4:07 PM  
**To:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Garrett Lynch <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Subject:** RE: Defense letter re curative instruction

---

**From:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](#)>  
**Sent:** Sunday, March 8, 2020 4:04 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](#)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](#)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](#)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](#)>; Garrett Lynch <[LynchG@dany.nyc.gov](#)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](#)>  
**Subject:** RE: Defense letter re curative instruction

Thanks. Can you send us the document itself?

---

**From:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](#)>  
**Sent:** Sunday, March 08, 2020 4:04 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](#)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](#)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](#)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](#)>; Garrett Lynch <[LynchG@dany.nyc.gov](#)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](#)>  
**Subject:** Defense letter re curative instruction

This is what they filed.

Michael Krouse  
Assistant United States Attorney  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2279

# **EXHIBIT 7**

---

**From:** [Lake, Stephanie \(USANYS\)](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#); [Kim, Jane \(USANYS\)](#) 4  
**Subject:** FW: Sadr - wire transfers  
**Date:** Sunday, March 08, 2020 4:20:00 PM  
**Attachments:** [Commerz OFAC disclosure.pdf](#)

---

This is the chain. None of us responded. I briefly discussed it with Garrett.

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Friday, January 10, 2020 4:52 PM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Sadr - wire transfers

In the spirit of closing the loop on the \$29M payment through Commerz, attached is the voluntary disclosure Commerze made to OFAC re: the payment.

---

**From:** Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]  
**Sent:** Friday, January 10, 2020 3:16 PM  
**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Sadr - wire transfers

Closing the loop on this— I found a document in the material Fuenmayor gave us that discusses the \$29 million transfer through Fondo Chino, and he also mentioned it in the last meeting. I think this should be helpful in tying the wire information we have showing the Fondo Chino transfer to PDVSA. The doc is attached, if anyone cares, but it's also en Espanol (I've requested translation). Pages 14-15.

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Wednesday, January 08, 2020 12:46 PM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Sadr - wire transfers

The Venezuelans used various state-owned “funds” and banks to fund various government projects, among them BANDES, the economic and social development bank (which, I believe made some early payments (not ours) related to the project), and Fondo Chino (the Chinese-Venezuelan Fund). Fondo Chino (at least ostensibly) was funded by oil sales to and loans from China (I think PDVSA and the government liberally moved money around). I forget exactly why Fondo Chino was used to make the first payment (or if we ever knew for sure) – my guess is that PDVSA, which controlled all oil-related funds (i.e., the Venezuelan purse), had adequate funds in the Fondo Chino account to make the payment from that account. I believe the money came from a Banco del Tesoro account in Venezuela, which had a correspondent relationship with Commerz in Germany. Thereafter, they

used PDVSA accounts at Banco Espirito Santo in Portugal.

---

**From:** Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]  
**Sent:** Wednesday, January 8, 2020 11:02 AM  
**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Sadr - wire transfers

Found the first one. Thanks. Do you know why it came from "Fondo Chino" / what that is?

That's fine on two. Just wanted to make sure I wasn't missing some other records that would show that information.

Definitely agree on the third point.

Thank you!

---

**From:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Sent:** Wednesday, January 08, 2020 10:04 AM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Sadr - wire transfers

1. Re: the first payment, there should be a copy of the SWIFT message in the Commerzbank production. In my version of the subpoena compliance production it's a PDF titled "Copy".
2. Re: the identity of the intermediary bank, the bank whose business record the wire transfer is is the intermediary bank, so the witness will be able to state that.
3. Also, for several of the payments, we have additional search warrant documents -- e.g., while we may just have the wire transfer record from the clearing bank, we may also have a SWIFT message attached to an email, or a Hyposwiss record, or some other document which identifies the payment route. When the dust settles on the SW docs, we can reconstruct my old payments binders where I had all of the documents bundled together for each payment (the payment instruction letter, the bank record(s), emails, attachments, etc.). This is what we did for the GJ.

---

**From:** Lake, Stephanie (USANYS) [<mailto:Stephanie.Lake@usdoj.gov>]  
**Sent:** Tuesday, January 7, 2020 6:19 PM  
**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** FW: Sadr - wire transfers

My original email had three attachments, which had to be sent to you securely. So you should be getting a secure message with instructions on how to access it.

---

**From:** Lake, Stephanie (USANYS)

**Sent:** Tuesday, January 07, 2020 5:37 PM

**To:** Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>;

Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>

**Subject:** Sadr - wire transfers

See attached a spreadsheet (Payments) showing each transfer and where I found documentation. A few things:

- 1) I didn't find a wire confirmation for the 4/4/2011 \$29 million transfer. I did find reference to it in the CHIPS subpoena returns. It seems to show that it went from "Fondo Chino-Venezolano" to Stratus International Contracting (see attached two spreadsheets that show this). Garrett – do you know if we have a wire confirmation for that transfer?
- 2) I noticed that the wire confirmations don't generally show the U.S. intermediary bank on them. Is there other documentation I'm missing that has this information?

\*All documents are saved here: [\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\Iran\\_VEHousing-2017R01160\###Trial\Documents\Payment](\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\Iran_VEHousing-2017R01160\###Trial\Documents\Payment) Records and here:

[\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\Iran\\_VEHousing-2017R01160\Evidence](\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\Iran_VEHousing-2017R01160\Evidence)  
[INT]\Discovery\#5 - Subpoena Returns\To Produce.

Also – Garrett, I was thinking that if you don't already have the ability to remotely login to our network, we should have that set up! That way the file paths above wouldn't be useless to you.

Thanks!

Stephanie Lake  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: (212) 637-1066

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NEW YORK BRANCH

Department of the Treasury  
Office of Foreign Assets Control  
1500 Pennsylvania Avenue NW  
Washington DC 20220

Vinay Jepal  
2 World Financial Center, New York, NY 10281-1050  
Telephone (212) 266-7200  
Fax (212) 266-7235  
[vinay.jepal@commerzbank.com](mailto:vinay.jepal@commerzbank.com)

June 16, 2011

**Re: Information Sharing – Stratus International Contracting Company**

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zuila, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller  
Board of Managing Directors: Martin Blessing (Chairman),  
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,  
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main  
Registered Office: Frankfurt am Main Reg.No. 32000  
VAT No. DE 114 103 514

**COMMERZBANK** 

NEW YORK BRANCH

**Re: Information Sharing – Stratus International Contracting Company– Page 2**

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG  
New York Branch



Deepa Keswani  
Head of AML/Anti-Fraud/Sanctions Compliance



Vinay Jepal  
Sanctions Compliance Officer

Encls.

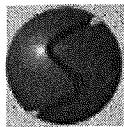
stratus intl payment

:LT Address :COBAUS3XA  
:transaction type :202 COVER bank tfr favour 3rd bank  
:input from :COBADEFF  
COMMERZBANK AG FRANKFURT  
HEAD OFFICE  
32-36 NEUE MAINZERSTRASSE  
60261 FRANKFURT GERMANY  
:validation Flag :COV}

{4: Text block:

:20 /transaction reference number :FAAS109400150500  
:21 /related reference :FAAS109400150500  
:32A/value date :040411 USD 29,442,967.57  
:52A/ordering institution - BIC :COBADEFF  
COMMERZBANK AG  
FRANKFURT AM MAIN  
:57A/account with inst - BIC :CHASUS33  
JPMORGAN CHASE BANK, N.A.  
NEW YORK, NY  
:58A/beneficiary inst - BIC :SHHBCHZZ  
HYPOSWISS PRIVATBANK AG, ZURICH  
ZURICH  
:50K/ordering customer :/400887746602USD  
BT/ FIDEICOMISO / FONDO CHINO  
VENEZOLANO. AV GUICAIPURO. URB EL  
ROSAL. TORRE BANCO DEL TESORO.  
CARACAS - VENEZUELA.  
:52A/ordering institution - BIC :BDTEVECA  
BANCO DEL TESORO, C.A. BANCO  
UNIVERSAL  
CARACAS  
:59 /beneficiary customer :/CH7708530519663100203  
STRATUS INTERNATIONAL CONTRACTING  
J.S.  
:70 /details of payment :REF: DESEMBOLSO NRO. 386 FONDO  
CHINO VENEZOLANO. CODIGO NRO.  
00579.  
:33B/amount :USD 29,442,967.57}

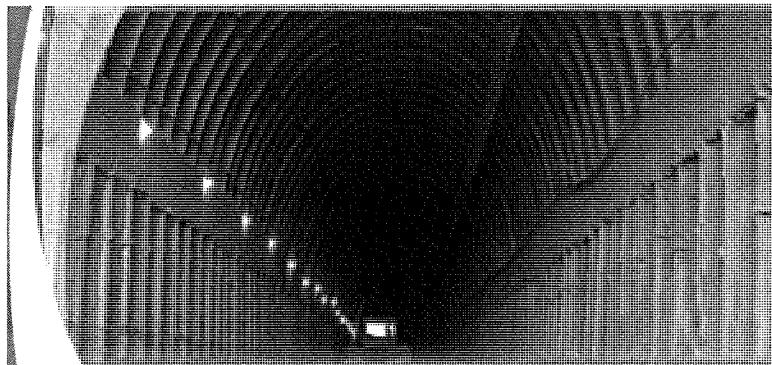
Entry : /SWIFT/ Date:110404 Time:02:44:17  
Info:1111/001781



**Stratus International  
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



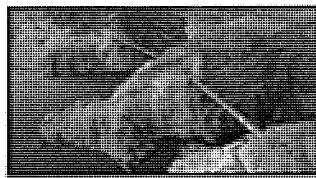
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

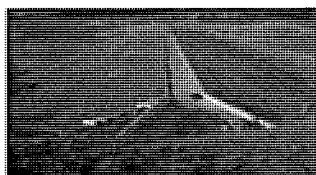
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
  - Federation of Contractors of Islamic Countries (F.C.I.C.)
  - Pakistan Engineering Council
  - International Chamber of Commerce (I.C.C.)
  - Iran – UK Chamber of Commerce
  - Iran – Canada Chamber of Commerce [Read more...](#)

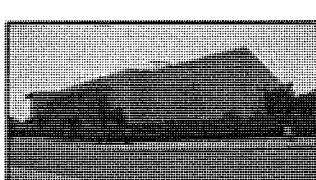
*Road & Railway*



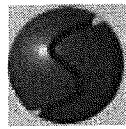
*Dam*



*Building*



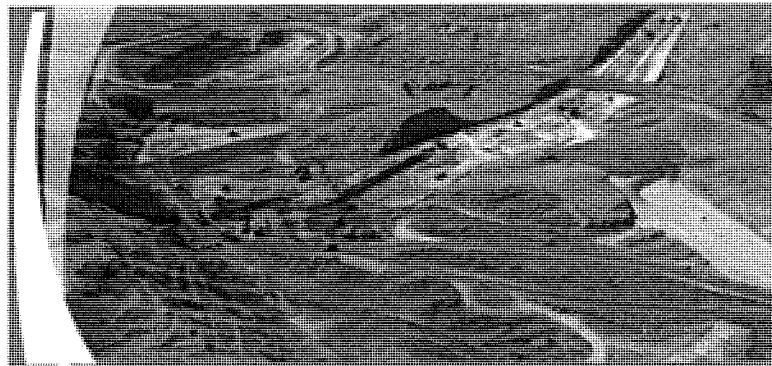
Contact



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---

**Contact Us**

---

**STRATUS International Contracting Co.**

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

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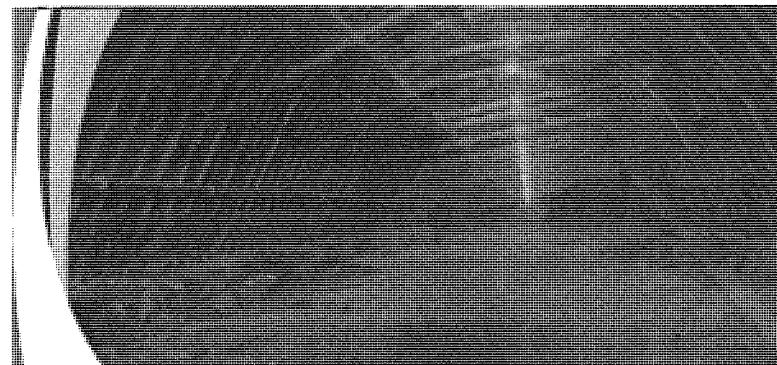
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**Middle East**  
Iran  
Iraq

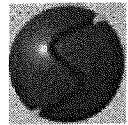
**CIS**  
Kazakhstan

**South America**  
Venezuela

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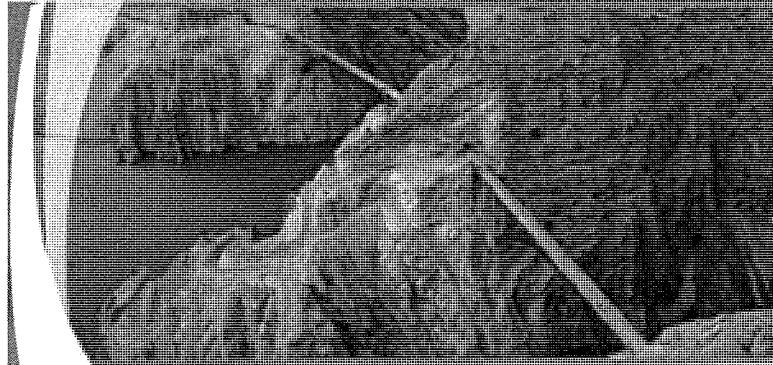
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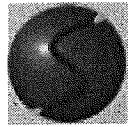


#### Sister Companies List

1. Samaneh Stratus (INVESTMENT CO.)
2. Iran Construction Investment Co.
3. Eghtesad - Novin Bank
4. Pishgaman Bazar Novin (BROKERAGE CO.)
5. Novin Insurance Co.
6. Pars Shahr Co.
7. Global Petro Tech CO.
8. Keyhan Tabadol Co.
9. Pars Hanza Aluminium CO.
10. Azarbaijan Industry Development Co.
11. Eghtesad Novin Investment CO.
12. Samaneh Gostar Novin

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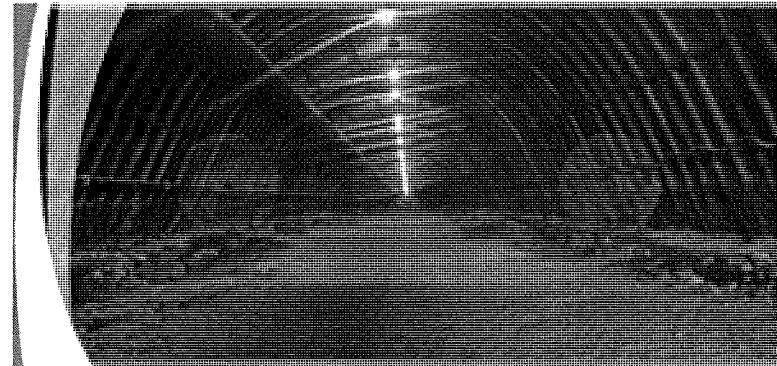
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Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



### 7000 Units 'New Ojeda' Housing Development Project

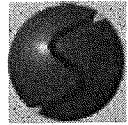
**Main Technical Features**

Site Gross Area : 318 Hec.  
 Concrete works : 520,000 m<sup>3</sup>  
 Net Construction Area : 850.000 m<sup>2</sup>  
 Water & Sewage network : 150 Km  
 Electrical network : 200 Km  
 Communication network : 220 Km  
 Gas network : 30 Km

**Location** Ciudad Ojeda, Zulia State, Venezuela  
**Employer** Ducolsa 'Urban Development S.A'  
**Contract Duration** 48 Months  
**Date of Award** September 2009  
**Status** [ Under Construction ]



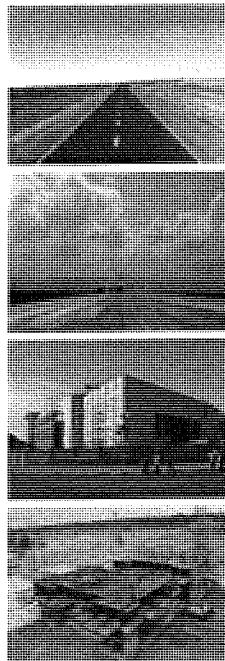
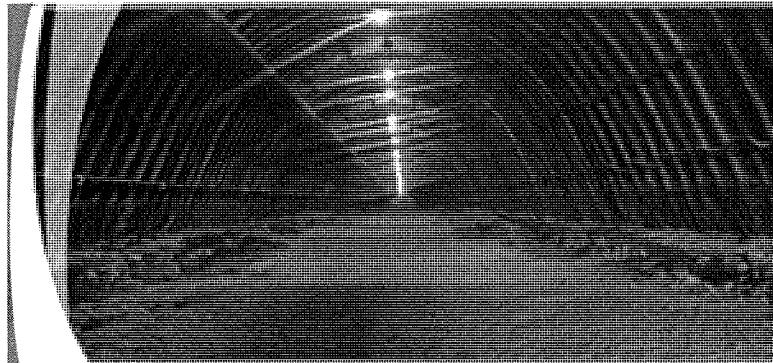
[Back to list]



**Stratus International**  
Contracting Company

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



**Dalbandin – Nokkundi Highway - Section III-B**

[Details >>](#)

**Socotra Airport**

[Details >>](#)

**Design & Construction of Parliament Building & Commercial Center in Djibouti City**

[Details >>](#)

**7000 Units "New Ojeda" Housing Development Project**

[Details >>](#)

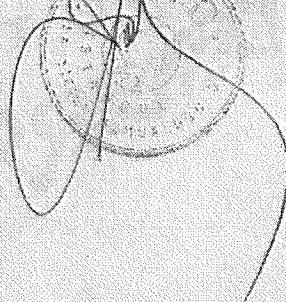
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(KADIKÖY)  
370857 - 2010T.C.  
İSTANBUL  
Ticaret Sicil Memurluğu

## SİCİL TASDIK NAMESİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükümlü şahsin mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICİBAŞI
Tasdknamenin düzenlenenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN  
İSTANBUL TİCARET SİCİLİ  
MEMURU YARDIMCISI

return email.

# **EXHIBIT 8**

---

**From:** [Bove, Emil \(USANYS\)](#)  
**To:** [Lake, Stephanie \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#); [Kim, Jane \(USANYS\) 4](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** RE: Defense witness letter  
**Date:** Sunday, March 08, 2020 4:54:30 PM

---

Can you guys please stop by? We will not chill you.

---

**From:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 4:34 PM  
**To:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: Defense witness letter

Ha. Shouldn't have used shorthand.

---

**From:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Sent:** Sunday, March 08, 2020 4:33 PM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Crowley, Shawn (USANYS)  
<[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: Defense witness letter

I was totally going for helpful rather than chilling, sorry I screwed that up. We're working through the summations, but let's circle up in 15-20 mins to talk strategy.

---

**From:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 4:29 PM  
**To:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** Defense witness letter

We filed the letter on the expert de-risking testimony this morning, but per the chilling conversation w/ Emil last night and the team this morning, did not file the cross portion of the letter. Based on our conversation with defense, who wants us to tee up these issues, we're looking to file the attached under seal. This contains what you looked at last night, plus a section on their character witness.

Stephanie Lake  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007

Tel: (212) 637-1066

# **EXHIBIT 9**

**March 8 – Crowley/Bove Chats**

**Emil J. . Bove 3:25 PM:**

did you get a readout about that call?

i'm a little scared

**Crowley, Shawn (USANYS) 3:25 PM:**

not yet...

**Emil J. . Bove 3:26 PM:**

(plane)(plane)(plane)(plane)(plane)(plane):&&

**Crowley, Shawn (USANYS) 3:28 PM:**

hhahah plane crash puke

[. . . .]

**Crowley, Shawn (USANYS) 4:05 PM:**

ugh

**Emil J. . Bove 4:06 PM:**

that is a word

**Emil J. . Bove 4:08 PM:**

they were pretty gentle with us actually in that fn

**Emil J. . Bove 4:16 PM:**

we need to sit down with these guys

they need to scrub, tonight

and be sure they are in compliance with brady

bc they are going to be asked in open court what they did

and right now it is, actually we don't give a shit

**Crowley, Shawn (USANYS) 4:18 PM:**

yes i agree

**Emil J. . Bove 4:21 PM:**

can i just ask them to stop by?

actually let's talk first

i am not sure there's utility in opposing the instruction

[. . . .]

**Crowley, Shawn (USANYS) 5:26 PM:**

i think i'm going to stop with the closing and devote the rest of the night to cleaning out my office

**Emil J. . Bove 5:26 PM:**

seriously

i was just going to write to you - like the window was on my screen and yours popped in - are we just awful at this

**Crowley, Shawn (USANYS) 5:27 PM:**

i honestly do not see how this is on us at all?

like are we supposed to review their files?

**Emil J. . Bove 5:27 PM:**

no its crazy but i also feel like its our unit and the unit is behaving like we're in vc

**Crowley, Shawn (USANYS) 5:27 PM:**

but you are definitely right that is how this will be perceived

**Emil J. . Bove 5:27 PM:**

like i can't even make the joke about vc bc they are better than us right now  
even in that meeting there was a resistance to acknowledging the gravity from some of them, i guess  
mainly krouse, who just doesn't care  
jane's looking down like its not her issue even though she's on the email

[. . .]

**Emil J. . Bove 6:04 PM:**

the dc cir case is actually a lot more defensible than what happened here

**Crowley, Shawn (USANYS) 6:05 PM:**

ugh

[. . .]

**Crowley, Shawn (USANYS) 6:15 PM:**

steph came by

garrett went back

said the commerzbank file is 10 years of investigation

on a shared drive

not text searchable

**Emil J. . Bove 6:15 PM:**

get some coffee

**Crowley, Shawn (USANYS) 6:15 PM:**

not very organized

**Emil J. . Bove 6:15 PM:**

we will get cocaine for you bud

**Crowley, Shawn (USANYS) 6:16 PM:**

he found where this came from, which is a 250 page document, which he is printing and reading

i said tell him he needs to search as much as he can between now and tomorrow morning

**Emil J. . Bove 6:16 PM:**

yes 100%

i have nothing appropriate to add to that

### **March 9 – Crowley/Bove Chats**

**Crowley, Shawn (USANYS) 12:02 PM:**

i just talked to bekah

she's going thru her stuff

**Emil J. . Bove 12:03 PM:**

nice thank you

[. . .]

**Bove, Emil (USANYS) 10:16 PM:**

she just said she wants to check.

**Crowley, Shawn (USANYS) 10:17 PM:**

fuck.

what did OFAC say?

**Emil J. . Bove 10:17 PM:**

they couldn't find it

**Crowley, Shawn (USANYS) 11:34 PM:**

garrett just gave me his edits  
do you have the draft? i can input

**Emil J. . Bove 11:34 PM:**

yes 1 sec i'm just fixing the part about his folder

# **EXHIBIT 10**

**From:** [Lake, Stephanie \(USANYS\)](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Subject:** Fwd: Order in 18cr224  
**Date:** Sunday, March 08, 2020 5:03:17 PM  
**Attachments:** [18cr224 Order 03.8.20.pdf](#)  
[ATT00001.htm](#)

---

Begin forwarded message:

**From:** Nathan NYSD Chambers <NathanNYSDChambers@nysd.uscourts.gov>  
**Date:** March 8, 2020 at 5:01:03 PM EDT  
**To:** "Kim, Jane (USANYS) 4" <JKim4@usa.doj.gov>, "Lake, Stephanie (USANYS)" <SLake@usa.doj.gov>, "Bbishop\_steptoe.com" <Bbishop@steptoe.com>, "Fragale, David" <DFragale@steptoe.com>, "Levin, Michelle" <mlevin@steptoe.com>, "Silverman, Nicholas" <nsilverman@steptoe.com>, "Weingarten, Reid" <RWeingarten@steptoe.com>, "Lynch, Garrett" <LynchG@dany.nyc.gov>, "Lynch, Garrett (USANYS) [Contractor]" <GLynch@usa.doj.gov>, "Heberlig, Brian" <BHeberlig@steptoe.com>, "Krouse, Michael (USANYS)" <MKrouse@usa.doj.gov>  
**Subject: RE: Order in 18cr224**

Counsel,

Attached please find a third Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 4:04 PM  
**To:** 'Kim, Jane (USANYS) 4' <Jane.Kim@usdoj.gov>; 'Lake, Stephanie (USANYS)' <Stephanie.Lake@usdoj.gov>; Bbishop\_steptoe.com <Bbishop@steptoe.com>; 'Fragale, David' <DFragale@steptoe.com>; 'Levin, Michelle' <mlevin@steptoe.com>; 'Silverman, Nicholas' <nsilverman@steptoe.com>; 'Weingarten, Reid' <RWeingarten@steptoe.com>; 'Lynch, Garrett' <LynchG@dany.nyc.gov>; 'Lynch, Garrett (USANYS) [Contractor]' <Garrett.Lynch@usdoj.gov>; 'Heberlig, Brian' <BHeberlig@steptoe.com>; 'Krouse, Michael (USANYS)' <Michael.Krouse@usdoj.gov>  
**Subject: RE: Order in 18cr224**

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,

Alyssa O'Gallagher

Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers

**Sent:** Sunday, March 8, 2020 12:48 PM

**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Bbishop\_steptoe.com <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

**Subject:** RE: Order in 18cr224

Counsel,

Please confirm receipt of this Order.

Sincerely,

Alyssa O'Gallagher

Law Clerk to the Hon. Alison J. Nathan

---

**From:** Nathan NYSD Chambers

**Sent:** Sunday, March 8, 2020 12:41 PM

**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Bbishop\_steptoe.com <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

**Subject:** Order in 18cr224

Counsel,

Attached please find an Order from Judge Nathan that will appear on the docket on Monday.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States of America,

—v—

Ali Sadr Hashemi Nejad,

Defendant.

18-cr-224 (AJN)

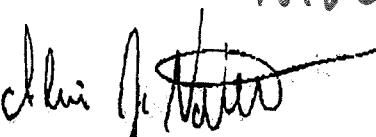
ORDER

ALISON J. NATHAN, District Judge:

In its response letter to be filed by 7 p.m., the Government shall include a detailed representation to the Court that explains why Government Exhibit 411 was not previously disclosed and what led to its disclosure for the first time yesterday. That representation shall further specify all attorneys involved in the decision-making with respect to both the non-disclosure and the subsequent disclosure yesterday of this document.

SO ORDERED.

Dated: March 8, 2020  
New York, New York

3/8/20  


---

ALISON J. NATHAN  
United States District Judge

# **EXHIBIT 11**

**From:** Crowley, Shawn (USANYS)  
**To:** Birger, Laura (USANYS); Bove, Emil (USANYS)  
**Subject:** RE: Sadr Trial - disclosure issue  
**Date:** Sunday, March 08, 2020 5:36:18 PM

---

You can call my desk – 212-637-1034

---

**From:** Birger, Laura (USANYS) <LBirger@usa.doj.gov>  
**Sent:** Sunday, March 08, 2020 5:35 PM  
**To:** Bove, Emil (USANYS) <EBove@usa.doj.gov>  
**Cc:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Subject:** Re: Sadr Trial - disclosure issue

I can talk now if that works. What number should I call?

Sent from my iPad

On Mar 8, 2020, at 5:20 PM, Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)> wrote:

Hi Laura, a disclosure issue arose over the weekend in the Sadr trial before Judge Nathan. In the attached order, AJN directed us to file a letter by 7pm tonight addressing the issue. We're here with the team working through it, but were hoping to have a quick call to give you the context and make sure you're ok with the planned approach. Thanks.

<18cr224 Order 03.8.20.pdf>

# **EXHIBIT 12**

**From:** [Lake, Stephanie \(USANYS\)](#)  
**To:** [Crowley, Shawn \(USANYS\)](#); [Bove, Emil \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#); [Kim, Jane \(USANYS\)](#) 4; [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** GX 411 response  
**Date:** Sunday, March 08, 2020 6:25:05 PM  
**Attachments:** [2020.03.08 Letter to Nathan re GX 411.docx](#)

---

I'm sorry – this is not very good. I'm not a fast writer, but didn't want to spend time revising and then have no time for your review.

Stephanie Lake  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: (212) 637-1066



United States Attorney  
Southern District of New York

---

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 8, 2020

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in response to the defendant's letter (Dkt. XX), and the Court's orders sent earlier today.

**I. History of Government Exhibit 411**

This Office received Government Exhibit 411 from the Manhattan DA's Office on January 10, 2020, in the context of a discussion about one of the payments relevant to this case.

Government Exhibit 411 is a voluntary disclosure that Commerzbank made to OFAC after clearing a payment from an entity affiliated with PDVSA in Venezuela to Stratus International Contracting (the "Payment"), which was one of the entities the defendant used to receive payments on behalf of IIHC. In the voluntary disclosure, dated June 16, 2011, Commerzbank reported that its money laundering filter flagged the Payment after it was already processed. The disclosure goes on to note that, after the Payment was alerted, Commerzbank investigated Stratus and learned that "Stratus was founded in 1978 in Tehran, Iran; Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings; Stratus is presently working on a 7000 Apartment Unit 'New Ojeda' Housing Development Project in Venezuela."

It further reported that, on May 12, 2011, Commerzbank received a response to its inquiry to the remitter bank, stating, in sum and substance, that Stratus's address is in Turkey, it is registered in Turkey, it does construction in, among other places, Venezuela, and the payment was for the "construction of a 7000 apartment unit project" in Venezuela.

Commerzbank concluded that "Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

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between the website and the response forwarded by the bank in Caracas, [Commerzbank] believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company. We have added Stratus into our sanctions filter to monitor any future payments.”

The Government viewed GX 411 as helpful to its case at trial, but unnecessary in light of GX 2032 and 2034. Those exhibits show that Commerzbank sent a series of questions to the remitter bank on April 27, 2011 related to the Payment. Those questions were ultimately forwarded to the defendant. The defendant responded with misleading information, including by failing to answer one of the questions posed about the identity of the beneficial owners and Citizenship of the owners of Stratus International Contracting.

Based on the availability of other, overlapping evidence, the Government did not extract GX 411 from its email and mark it as an exhibit. The members of the team from this Office wrongly assumed that the document had been part of the Commerzbank subpoena return and therefore had been produced to the defense in discovery in 2018. We erred in failing to confirm with the DA’s office the source of the document, and in failing to confirm that it was in fact part of the Commerzbank discovery that had previously been produced. We now understand that GX 411 was obtained through an unrelated DANY investigation into Commerzbank and therefore had not previously been produced in discovery. There was no affirmative decision made not to produce GX 411 to the defense. Had we realized it was not part of an earlier discovery production, we would have provided it immediately upon receiving it.

This weekend, one of the members of the prosecution team came upon GX 411 in Outlook while organizing emails related to this case and others. Based on arguments the defense had made on Friday during Robert Peri’s cross-examination, GX 411 now appeared useful to the Government’s case, in addition to GX 2032 and 2034. For example, defense counsel asked Peri whether “Citigroup . . . conduct[ed] any research regarding the Iranian International Housing Company when it was reviewing” one of the transactions in the case. (Trial Tr. at 931.) GX 411 presented an example of a bank doing precisely what defense counsel had accused Citigroup of failing to do – it researched a flagged transaction, and then added the concerning party to its sanctions filter.

At that time, the Government realized that GX 411 had not in fact been part of the Commerzbank discovery. All members of the team agreed that the document should be produced to the defense. No member of the Government team anticipated that the defense would view GX 411 as helpful to the defense case.

## **II. The Defendant’s *Brady* Claim**

The defendant has stated that GX 411 is exculpatory evidence for three reasons. First, “because Stratus Turkey’s affiliation with Stratus Iran was not material either to OFAC or the intermediary banks,” second, because “the intermediary banks conducted independent investigation and could easily identify the affiliation between Stratus Turkey and Stratus Iran” and, third “neither the intermediary bank nor OFAC deemed the disparities in information about the

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

Page 3

two Stratus International Contractings working on the Ojeda project as important enough to stop U.S. dollar payments to Stratus International Contracting J.S.”

The Government now understand how GX 411 could advance the defendant’s claim that any decision by OFAC not to take enforcement action following this disclosure is probative of the risk of harm from OFAC enforcement that banks face when the process sanctions violative transactions. However, as the defense has identified, this is a point the defendant already elicited from Ted Kim’s. Kim testified that, to his knowledge, OFAC did not investigate this case. The Government is seeking to confirm whether OFAC took any action based on the Commerzbank disclosure, and is willing to enter into a stipulation that it did not if and when it gets confirmation from OFAC.

However, the Government does not agree that GX 411 is helpful to the defense for the other reasons proffered. First, GX 411 shows that Stratus Turkey’s affiliation with Stratus Iran was material to Commerzbank, as Commerzbank added Stratus International Contracting to its sanctions filter following its review of this transaction.

Second, Commerzbank was only able to identify the connection between Stratus Turkey and Iran because the transaction was flagged for money laundering and it then launched an investigation. Absent that flag, nobody would have known to look into the companies. In addition, the Court has precluded the defendant from arguing that the banks “could easily identify the affiliation between” the front companies and Iran. *See* Dkt. XX.

The Government regrets its error and is working to confirm that there is nothing else related to the Commerzbank investigation that has any bearing in this case, and that there have been no other omissions from the materials produced to the defense.

However, the Government does not believe that the proposed curative instruction is necessary. In our conversations with the defense, the defense explained that it sought the instruction because the jury would not understand why they are seeing GX 411 for the first time at the end of the trial. But, if it is admitted, the Government expects that GX 411 will be admitted as part of the evidence on the payments in this case, which is its logical place.<sup>1</sup> As stated above, the Government is also willing to enter a stipulation that OFAC did not take action regarding the disclosure, pending OFAC’s confirmation of this point. The Government believes this will

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<sup>1</sup> If the defendant determines that he does not want to admit GX 411, the Government has agreed not to offer it in light of the late disclosure.

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

Page 4

sufficiently cure any potential prejudice the defendant could have suffered through the Government's late disclosure of GX 411.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Jane Kim / Michael Krouse / Stephanie Lake  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney  
(212) 637-2038 / 2279 / 1066

cc: Defense Counsel (by ECF)

# **EXHIBIT 13**

**From:** [Crowley, Shawn \(USANYS\)](#)  
**To:** [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Kim, Jane \(USANYS\)](#) 4; [Garrett Lynch](#)  
**Cc:** [Bove, Emil \(USANYS\)](#)  
**Subject:** 2020.03.08 Letter to Nathan re GX 411 sgc.docx  
**Date:** Sunday, March 08, 2020 6:54:19 PM  
**Attachments:** [2020.03.08 Letter to Nathan re GX 411 sgc.docx](#)

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United States Attorney  
Southern District of New York

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 8, 2020

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in response to the defendant's letter (Dkt. XX), and the Court's orders sent earlier today. The Government concedes that it erroneously failed to timely disclose the document at issue, and apologizes to the Court and counsel for its error. As a result, the Government will not seek to offer the document in evidence and, to the extent the defense intends to offer it, will stipulate to its admission and to relevant facts relating to OFAC's handling of the letter.

**I. Disclosure of Government Exhibit 411**

Government Exhibit 411 was first produced to the Manhattan DA's Office on [XX] in the course of a separate investigation of a particular bank ("Bank-1"). SAUSA Lynch emailed This Office received Government Exhibit 411 to AUSAs Kim, Krouse, and Lake from the Manhattan DA's Office on January 10, 2020, in the context of a discussion about one of the payments relevant to this case. The prosecution team wrongly assumed that Government Exhibit 411 had been produced to the defense, and failed to verify whether it had been. This was a mistake. The Government does not dispute that the document should have been disclosed along with its Rule 16 productions.

This weekend, AUSA Lake came upon GX 411 in Outlook while organizing emails related to this case and others. At the time, AUSA Lake concluded that the Government may wish to offer GX 411 in its case in chief, consulted the other members of the prosecution team, marked GX 411 as an exhibit, and emailed it to defense counsel.<sup>1</sup>

<sup>1</sup> Based on arguments the defense had made on Friday during Robert Peri's cross-examination, GX 411 appeared useful to the Government's case, in addition to GX 2032 and 2034. For example, defense counsel asked Peri whether "Citigroup . . . conduct[ed] any research regarding the Iranian

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

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Government Exhibit 411 is a voluntary disclosure that Bank-1 made to OFAC after clearing a payment from an entity affiliated with PDVSA in Venezuela to Stratus International Contracting (the “Payment”), which was one of the entities the defendant used to receive payments on behalf of IIHC. In the voluntary disclosure, dated June 16, 2011, Bank-1 processed. The disclosure goes on to note that, after the Payment was alerted, Bank-1 investigated Stratus and learned that “Stratus was founded in 1978 in Tehran, Iran; Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings; Stratus is presently working on a 7000 Apartment Unit ‘New Ojeda’ Housing Development Project in Venezuela.”

It further reported that, on May 12, 2011, Bank-1 received a response to its inquiry to the remitter bank, stating, in sum and substance, that Stratus’s address is in Turkey, it is registered in Turkey, it does construction in, among other places, Venezuela, and the payment was for the “construction of a 7000 apartment unit project” in Venezuela.

Bank-1 concluded that “Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, [Bank-1] believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company. We have added Stratus into our sanctions filter to monitor any future payments.”

GX 2032 and 2034 show that Bank-1 sent a series of questions to the remitter bank on April 27, 2011 related to the Payment. Those questions were ultimately forwarded to the defendant. The defendant responded with misleading information, including by failing to answer one of the questions posed about the identity of the beneficial owners and Citizenship of the owners of Stratus International Contracting.

## **II. The Defendant’s *Brady* Claim**

Based on conversations the Government has had with defense counsel this weekend, the Government now understands how GX 411 could advance the defendant’s claim that any decision by OFAC not to take enforcement action following this disclosure is probative of the risk of harm from OFAC enforcement that banks face when they process transactions in violation of the sanctions laws. The Government is currently seeking to confirm whether OFAC took any action based on Bank-1’s disclosure, and is willing to enter to stipulate that OFAC did not take action against Bank-1, the Stratus entities, or the defendant.

The Government regrets its error and is working to confirm that there is nothing else related to the Bank-1 investigation that has any bearing in this case, and that there have been no other

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International Housing Company when it was reviewing” one of the transactions in the case. (Trial Tr. at 931.) GX 411 presented an example of a bank doing precisely what defense counsel had accused Citigroup of failing to do – it researched a flagged transaction, and then added the concerning party to its sanctions filter.

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

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omissions from the materials produced to the defense, both at the U.S. Attorney's Office and DANY. And, in light of our late disclosure of GX 411, we will not seek to offer it at trial. To the extent the defense wishes to offer GX 411 in its case, the Government has no objection and will stipulate to its admissibility. As a result, the defendant is not prejudiced by the late disclosure, and in light of the fact that they have not begun to present evidence, no curative instruction is necessary.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_/s/  
Jane Kim / Michael Krouse / Stephanie Lake  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney  
(212) 637-2038 / 2279 / 1066

cc: Defense Counsel (by ECF)

# **EXHIBIT 14**

**From:** [Crowley, Shawn \(USANYS\)](#)  
**To:** [Lake, Stephanie \(USANYS\)](#)  
**Cc:** [Bove, Emil \(USANYS\)](#)  
**Subject:** 2020.03.08 Letter to Nathan re GX 411 sgc2.docx  
**Date:** Sunday, March 08, 2020 7:01:07 PM  
**Attachments:** [2020.03.08 Letter to Nathan re GX 411 sgc2.docx](#)

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A few typos



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 8, 2020

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in response to the defendant's letter (Dkt. XX), and the Court's orders ~~sent earlier today from today~~. The Government concedes that it erroneously failed to timely disclose the document at issue, and apologizes to the Court and counsel for its error. As a result, the Government will not seek to offer the document in evidence and, to the extent the defense intends to offer it, will stipulate to its admission and to relevant facts relating to OFAC's handling of the letter.

**I. Disclosure of Government Exhibit 411**

Government Exhibit 411 was first produced to the Manhattan DA's Office on [XX] in the course of a separate investigation of a particular bank ("Bank-1"). SAUSA Lynch emailed Government Exhibit 411 to AUSAs Kim, Krouse, and Lake on January 10, 2020, in the context of a discussion about one of the payments relevant to this case. -The prosecution team wrongly assumed that Government Exhibit 411 had been produced to the defense, and failed to verify whether it had been. This was a mistake. The Government does not dispute that the document should have been disclosed along with its Rule 16 productions.

This weekend, AUSA Lake came upon GX 411 in Outlook while organizing emails related to this case and others. At the time, AUSA Lake concluded that the Government may wish to offer GX 411 in its case in chief, consulted the other members of the prosecution team, marked GX 411 as an exhibit, and emailed it to defense counsel.<sup>1</sup>

---

<sup>1</sup> Based on arguments the defense had made on Friday during Robert Peri's cross-examination, GX 411 appeared useful to the Government's case, in addition to GX 2032 and 2034. For example, defense counsel asked Peri whether "Citigroup . . . conduct[ed] any research regarding the Iranian International Housing Company when it was reviewing" one of the transactions in the case. (Trial

The Honorable Alison J. Nathan, U.S.D.J.

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Page 2

Government Exhibit 411 is a voluntary disclosure that Bank-1 made to OFAC after clearing a payment from an entity affiliated with PDVSA in Venezuela to Stratus International Contracting (the “Payment”), which was one of the entities the defendant used to receive payments on behalf of IIHC. In the voluntary disclosure, dated June 16, 2011, Bank-1 ~~noted~~ ~~The disclosure goes on to note~~ that, after the Payment was ~~alerted~~~~processed~~, Bank-1 investigated Stratus and learned that “Stratus was founded in 1978 in Tehran, Iran; Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings; Stratus is presently working on a 7000 Apartment Unit ‘New Ojeda’ Housing Development Project in Venezuela.”

It further reported that, on May 12, 2011, Bank-1 received a response to its inquiry to the remitter bank, stating, in sum and substance, that Stratus’s address is in Turkey, it is registered in Turkey, it does construction in, among other places, Venezuela, and the payment was for the “construction of a 7000 apartment unit project” in Venezuela.

Bank-1 concluded that “Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, [Bank-1] believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company. We have added Stratus into our sanctions filter to monitor any future payments.”

GX 2032 and 2034, ~~which have been admitted in evidence~~, show that Bank-1 sent a series of questions to the remitter bank on April 27, 2011 related to the Payment. Those questions were ultimately forwarded to the defendant. The defendant responded with misleading information, including by failing to answer one of the questions posed about the identity of the beneficial owners and Citizenship of the owners of Stratus International Contracting.

## II. The Defendant’s *Brady* Claim

Based on conversations the Government ~~has~~ had with defense counsel this weekend, the Government now understands how GX 411 could advance the defendant’s claim that any decision by OFAC not to take enforcement action following this disclosure is probative of the risk of harm from OFAC enforcement that banks face when they process transactions in violation of the sanctions laws. -The Government is currently seeking to confirm whether OFAC took any action based on Bank-1’s disclosure, and is willing to ~~enter to~~ stipulate that OFAC did not take action against Bank-1, the Stratus entities, or the defendant.

The Government regrets its error and is working to confirm that there is nothing else related to the Bank-1 investigation that has any bearing in this case, and that there have been no other omissions from the materials produced to the defense, both at the U.S. Attorney’s Office and

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Tr. at 931.) GX 411 presented an example of a bank doing precisely what defense counsel had accused Citigroup of failing to do – it researched a flagged transaction, and then added the concerning party to its sanctions filter.

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

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DANY. ~~And, in In~~ light of our late disclosure of GX 411, we will not seek to offer it at trial. To the extent the defense wishes to offer GX 411 in its case, the Government has no objection and will stipulate to its admissibility. As a result, the defendant is not prejudiced by the late disclosure, and in light of the fact that they have not begun to present evidence, no curative instruction is necessary.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_ /s/  
Jane Kim / Michael Krouse / Stephanie Lake  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney  
(212) 637-2038 / 2279 / 1066

cc: Defense Counsel (by ECF)

# **EXHIBIT 15**



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 8, 2020

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in response to the defendant's letter (Dkt. XX), and the Court's orders sent earlier today from today. The Government concedes that it erroneously failed to timely disclose the document at issue, and apologizes to the Court and counsel for its error. As a result, the Government will not seek to offer the document in evidence and, to the extent the defense intends to offer it, will stipulate to its admission and to relevant facts relating to OFAC's handling of the letter.

**I. History Disclosure of Government Exhibit 411**

This Office received \_\_\_\_\_ Government Exhibit 411 from was first produced to the Manhattan DA's Office on [XX] in the course of a separate investigation of a particular bank ("Bank-1"). SAUSA Lynch emailed Government Exhibit 411 to AUSAs Kim, Krouse, and Lake on January 10, 2020, in the context of a discussion about one of the payments relevant to this case. The prosecution team wrongly assumed that Government Exhibit 411 had been produced to the defense, and failed to verify whether it had been. This was a mistake. The Government does not dispute that the document should have been disclosed along with its Rule 16 productions.

This weekend, AUSA Lake came upon GX 411 in Outlook while organizing emails related to this case and others. At the time, AUSA Lake concluded that the Government may wish to offer GX 411 in its case in chief, consulted the other members of the prosecution team, marked GX 411 as an exhibit, and emailed it to defense counsel.<sup>1</sup>

← Formatted: Indent: Left: 0", First line: 0"

<sup>1</sup> Based on arguments the defense had made on Friday during Robert Peri's cross-examination, GX 411 appeared useful to the Government's case, in addition to GX 2032 and 2034. For example, defense counsel asked Peri whether "Citigroup . . . conduct[ed] any research regarding the Iranian

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

Page 2

Government Exhibit 411 is a voluntary disclosure that ~~Commerzbank~~<sup>Bank-1</sup> made to OFAC after clearing a payment from an entity affiliated with PDVSA in Venezuela to Stratus International Contracting (the “Payment”), which was one of the entities the defendant used to receive payments on behalf of IHC. In the voluntary disclosure, dated June 16, 2011, ~~Commerzbank reported~~<sup>Bank-1 noted</sup> that ~~its money laundering filter flagged, after~~ the Payment ~~after it was already processed.~~ ~~The disclosure goes on to note that, after the Payment was alerted,~~ ~~Commerzbank,~~ <sup>Bank-1</sup> investigated Stratus and learned that “Stratus was founded in 1978 in Tehran, Iran; Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings; Stratus is presently working on a 7000 Apartment Unit ‘New Ojeda’ Housing Development Project in Venezuela.”

It further reported that, on May 12, 2011, ~~Commerzbank~~<sup>Bank-1</sup> received a response to its inquiry to the remitter bank, stating, in sum and substance, that Stratus’s address is in Turkey, it is registered in Turkey, it does construction in, among other places, Venezuela, and the payment was for the “construction of a 7000 apartment unit project” in Venezuela.

~~Commerzbank~~<sup>Bank-1</sup> concluded that “Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, [Commerzbank] believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company. We have added Stratus into our sanctions filter to monitor any future payments.”

~~The Government viewed GX 411 as helpful to its case at trial, but unnecessary in light of GX 2032 and 2034. Those exhibits, which have been admitted in evidence, show that Commerzbank~~<sup>Bank-1</sup> sent a series of questions to the remitter bank on April 27, 2011 related to the Payment. Those questions were ultimately forwarded to the defendant. The defendant responded with misleading information, including by failing to answer one of the questions posed about the identity of the beneficial owners and Citizenship of the owners of Stratus International Contracting.

~~Based on the availability of other, overlapping evidence, the Government did not extract GX 411 from its email and mark it as an exhibit. The members of the team from this Office wrongly assumed that the document had been part of the Commerzbank subpoena return and therefore had been produced to the defense in discovery in 2018. We erred in failing to confirm with the DA’s office the source of the document, and in failing to confirm that it was in fact part of the Commerzbank discovery that had previously been produced. We now understand that GX 411 was obtained through an unrelated DANY investigation into Commerzbank and therefore had not previously been produced in discovery. There was no affirmative decision made not to produce~~

International Housing Company when it was reviewing” one of the transactions in the case. (Trial Tr. at 931.) GX 411 presented an example of a bank doing precisely what defense counsel had accused Citigroup of failing to do – it researched a flagged transaction, and then added the concerning party to its sanctions filter.

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

Page 3

~~GX 411 to the defense. Had we realized it was not part of an earlier discovery production, we would have provided it immediately upon receiving it.~~

~~This weekend, one of the members of the prosecution team came upon GX 411 in Outlook while organizing emails related to this case and others. Based on arguments the defense had made on Friday during Robert Peri's cross examination, GX 411 now appeared useful to the Government's case, in addition to GX 2032 and 2034. For example, defense counsel asked Peri whether "Citigroup . . . conduct[ed] any research regarding the Iranian International Housing Company when it was reviewing" one of the transactions in the case. (Trial Tr. at 931.) GX 411 presented an example of a bank doing precisely what defense counsel had accused Citigroup of failing to do—it researched a flagged transaction, and then added the concerning party to its sanctions filter.~~

~~At that time, the Government realized that GX 411 had not in fact been part of the Commerzbank discovery. All members of the team agreed that the document should be produced to the defense. No member of the Government team anticipated that the defense would view GX 411 as helpful to the defense case.~~

#### **H. The Defendant's *Brady* Claim**

~~The defendant has stated that GX 411 is exculpatory evidence for three reasons. First, "because Stratus Turkey's affiliation with Stratus Iran was not material either to OFAC or the intermediary banks," second, because "the intermediary banks conducted independent investigation and could easily identify the affiliation between Stratus Turkey and Stratus Iran" and, third "neither the intermediary bank nor OFAC deemed the disparities in information about the two Stratus International Contractings working on the Ojeda project as important enough to stop U.S. dollar payments to Stratus International Contracting J.S."~~

#### **II. The Government now understands The Defendant's *Brady* Claim**

~~Based on conversations the Government had with defense counsel this weekend, the Government now understands how GX 411 could advance the defendant's claim that any decision by OFAC not to take enforcement action following this disclosure is probative of the risk of harm from OFAC enforcement that banks face when ~~the~~they process ~~sanctions violative~~ transactions. However, as the defense has identified, this is a point the defendant already elicited from Ted Kim's. Kim testified that, to his knowledge, OFAC did not investigate this case, in violation of the sanctions laws. The Government is currently seeking to confirm whether OFAC took any action based on the ~~Commerzbank~~Bank-1's disclosure, and is willing to enter into a stipulation that ~~it~~OFAC did not ~~if and when it gets confirmation from OFAC~~ take action against Bank-1, the Stratus entities, or the defendant.~~

~~However, the Government does not agree that GX 411 is helpful to the defense for the other reasons proffered. First, GX 411 shows that Stratus Turkey's affiliation with Stratus Iran was material to Commerzbank, as Commerzbank added Stratus International Contracting to its sanctions filter following its review of this transaction.~~

The Honorable Alison J. Nathan, U.S.D.J.  
March 8, 2020  
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~~Second, Commerzbank was only able to identify the connection between Stratus Turkey and Iran because the transaction was flagged for money laundering and it then launched an investigation. Absent that flag, nobody would have known to look into the companies. In addition, the Court has precluded the defendant from arguing that the banks "could easily identify the affiliation between" the front companies and Iran. See Dkt. XX.~~

The Government regrets its error and is working to confirm that there is nothing else related to the ~~Commerzbank~~<sup>Bank-1</sup> investigation that has any bearing in this case, and that there have been no other omissions from the materials produced to the defense, ~~both at the U.S. Attorney's Office and DANY. In light of our late disclosure of GX 411, we will not seek to offer it at trial. To the extent the defense wishes to offer GX 411 in its case, the Government has no objection and will stipulate to its admissibility. As a result, the defendant is not prejudiced by the late disclosure, and in light of the fact that they have not begun to present evidence, no curative instruction is necessary.~~

However, the Government does not believe that the proposed curative instruction is necessary. In our conversations with the defense, the defense explained that it sought the instruction because the jury would not understand why they are seeing GX 411 for the first time at the end of the trial. But, if it is admitted, the Government expects that GX 411 will be admitted as part of the evidence on the payments in this case, which is its logical place.<sup>2</sup> As stated above, the Government is also willing to enter a stipulation that OFAC did not take action regarding the disclosure, pending OFAC's confirmation of this point. The Government believes this will sufficiently cure any potential prejudice the defendant could have suffered through the Government's late disclosure of GX 411.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: /s/  
Jane Kim / Michael Krouse / Stephanie Lake  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney  
(212) 637-2038 / 2279 / 1066

cc: Defense Counsel (by ECF)

<sup>2</sup>~~If the defendant determines that he does not want to admit GX 411, the Government has agreed not to offer it in light of the late disclosure.~~

# **EXHIBIT 16**

**From:** Crowley, Shawn (USANYS)  
**To:** Lake, Stephanie (USANYS); Bove, Emil (USANYS)  
**Cc:** Krouse, Michael (USANYS); Kim, Jane (USANYS) 4; Lynch, Garrett (USANYS) [Contractor]  
**Subject:** RE: GX 411 response  
**Date:** Sunday, March 08, 2020 7:08:19 PM

---

Sorry, can you guys swing by my office once you've filed this letter? Thank you!

---

**From:** Lake, Stephanie (USANYS) <SLake@usa.doj.gov>  
**Sent:** Sunday, March 08, 2020 6:25 PM  
**To:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>; Bove, Emil (USANYS) <EBove@usa.doj.gov>  
**Cc:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Kim, Jane (USANYS) 4  
<JKim4@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Subject:** GX 411 response

I'm sorry – this is not very good. I'm not a fast writer, but didn't want to spend time revising and then have no time for your review.

Stephanie Lake  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: (212) 637-1066

# **EXHIBIT 17**

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**From:** [Bove, Emil \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#); [Crowley, Shawn \(USANYS\)](#); [Lake, Stephanie \(USANYS\)](#)  
**Cc:** [Krouse, Michael \(USANYS\)](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** RE: GX 411 response  
**Date:** Sunday, March 08, 2020 7:43:13 PM

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Great, thank you.

---

**From:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 7:43 PM  
**To:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>; Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>;  
Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor]  
<[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: GX 411 response

I emailed them. I can call them now.

---

**From:** Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 7:32 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Lake, Stephanie (USANYS)  
<[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: GX 411 response

Really sorry to be annoying, but want to make sure we've put down a call and an email to OFAC on this issue – basically to the point in our letter about seeking to confirm their (non)response to the letter.

---

**From:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>  
**Sent:** Sunday, March 8, 2020 7:08 PM  
**To:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: GX 411 response

Sorry, can you guys swing by my office once you've filed this letter? Thank you!

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**From:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>  
**Sent:** Sunday, March 08, 2020 6:25 PM  
**To:** Crowley, Shawn (USANYS) <[SCrowley@usa.doj.gov](mailto:SCrowley@usa.doj.gov)>; Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)>  
**Cc:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Kim, Jane (USANYS) 4  
<[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** GX 411 response

I'm sorry – this is not very good. I'm not a fast writer, but didn't want to spend time revising and then have no time for your review.

Stephanie Lake  
Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007  
Tel: (212) 637-1066

# **EXHIBIT 18**

**From:** [Bove, Emil \(USANYS\)](#)  
**To:** [Berman, Geoffrey \(USANYS\)](#); [Strauss, Audrey \(USANYS\)](#); [Stewart, Craig \(USANYS\)](#); [Graff, Ilan \(USANYS\)](#); [Birger, Laura \(USANYS\)](#)  
**Cc:** [Crowley, Shawn \(USANYS\)](#)  
**Subject:** Sadr trial - disclosure issue  
**Date:** Sunday, March 08, 2020 7:53:49 PM  
**Attachments:** [Govt Letter.pdf](#)  
[GX 411.pdf](#)  
[Defense letter.pdf](#)

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As discussed with Laura, we wanted to flag a disclosure issue that arose this weekend in the Sadr trial before Judge Nathan. This is the Iranian sanctions case where DANY is a part of the prosecution team.

The issue relates to a document that DANY obtained in a separate investigation in 2015. The document is attached as GX 411. In January 2020, our DANY SAUSA emailed the document to the rest of the team during a discussion about a summary chart. At that time, our folks assumed incorrectly, and did not verify, that the document had already been produced to the defense. Late Saturday afternoon, a member of the team came across the document again, and viewed it as inculpatory to such an extent that the team emailed it to defense marked as a government exhibit, GX 411. During subsequent communications last night and this morning, defense counsel explained how the document supports their defense.

This afternoon, the defense filed the attached letter with Judge Nathan seeking a jury instruction about the untimely disclosure. Our response, which Judge Nathan directed us to file by 7, is also attached. Although we opposed the requested instruction, we conceded error, agreed not to offer GX 411 (which we still think is, on balance, very helpful to our case), and offered related authenticity and factual stipulations to the extent the defense wants to use the letter. Tonight, our team is scouring the case file -- here and at DANY -- to verify that we are in compliance with our disclosure obligations. They are also preparing to answer detailed factual questions from Judge Nathan tomorrow morning about the situation, which we discussed during a team meeting after we filed the letter.

Sorry to be reporting this, especially on a Sunday night. We'll be in court with the team at the start of the day tomorrow, and will keep you updated. The team expects to rest tomorrow, and to do closings Tuesday or Wednesday depending on the length of the defense case and the scheduling of the charge conference.



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

March 8, 2020

**FILED BY ECF**

The Honorable Alison J. Nathan  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**Re: *United States v. Ali Sadr Hashemi Nejad, 18 Cr. 224 (AJN)***

Dear Judge Nathan:

The Government respectfully submits this letter in response to the defendant's letter (Dkt. 274), and the Court's orders sent earlier today. The Government concedes that it erroneously failed to timely disclose the document at issue, and apologizes to the Court and counsel for its error. As a result, the Government will not seek to offer the document in evidence and, to the extent the defense intends to offer it, will stipulate to its admission and to relevant facts relating to OFAC's handling of the letter.

**I. Disclosure of Government Exhibit 411**

Government Exhibit 411 was first produced to the Manhattan DA's Office in 2015 in the course of a separate investigation of a particular bank ("Bank-1"). SAUSA Lynch emailed Government Exhibit 411 to AUSAs Kim, Krouse, and Lake on January 10, 2020, in the context of a discussion about one of the payments relevant to this case. The prosecution team wrongly assumed that Government Exhibit 411 had been produced to the defense, and failed to verify whether it had been. This was a mistake. The Government does not dispute that the document should have been disclosed along with its Rule 16 productions.

This weekend, AUSA Lake came upon GX 411 in Outlook while organizing emails related to this case and others. At the time, AUSA Lake concluded that the Government may wish to offer GX 411 in its case in chief, consulted the other members of the prosecution team, marked GX 411 as an exhibit, and emailed it to defense counsel.<sup>1</sup> It was only in the context of this process that the

---

<sup>1</sup> Based on arguments the defense had made on Friday during Robert Peri's cross-examination, GX 411 appeared useful to the Government's case, in addition to GX 2032 and 2034. For example, defense counsel asked Peri whether "Citigroup . . . conduct[ed] any research regarding the Iranian International Housing Company when it was reviewing" one of the transactions in the case. (Trial

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

Page 2

Government realized that GX 411 was not part of Bank-1's subpoena production, which had been provided to the defense in discovery.

Government Exhibit 411 is a voluntary disclosure that Bank-1 made to OFAC after clearing a payment from an entity affiliated with PDVSA in Venezuela to Stratus International Contracting (the "Payment"), which was one of the entities the defendant used to receive payments on behalf of IIHC. In the voluntary disclosure, dated June 16, 2011, Bank-1 noted that it had processed the Payment on April 4, 2011, but flagged it for potential money laundering after the fact, on April 20, 2011. The disclosure goes on to note that, after the Payment was alerted, Bank-1 investigated Stratus and learned that "Stratus was founded in 1978 in Tehran, Iran; Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings; Stratus is presently working on a 7000 Apartment Unit 'New Ojeda' Housing Development Project in Venezuela."

It further reported that, on May 12, 2011, Bank-1 received a response to its inquiry to the remitter bank, stating, in sum and substance, that Stratus's address is in Turkey, it is registered in Turkey, it does construction in, among other places, Venezuela, and the payment was for the "construction of a 7000 apartment unit project" in Venezuela.

Bank-1 concluded that "Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, [Bank-1] believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company. We have added Stratus into our sanctions filter to monitor any future payments."

GX 2032 and 2034 show that Bank-1 sent a series of questions to the remitter bank on April 27, 2011 related to the Payment. Those questions were ultimately forwarded to the defendant. The defendant responded with misleading information, including by failing to answer one of the questions posed about the identity of the beneficial owners and Citizenship of the owners of Stratus International Contracting.

## II. The Defendant's *Brady* Claim

Based on conversations the Government has had with defense counsel this weekend, the Government now understands how GX 411 advances the defendant's claim that any decision by OFAC not to take enforcement action following this disclosure is probative of the risk of harm from OFAC enforcement that banks face when they process transactions in violation of the sanctions laws. The Government is currently seeking to confirm whether OFAC took any action based on Bank-1's disclosure, and is willing to stipulate that OFAC did not take action against Bank-1, the Stratus entities, or the defendant.

---

Tr. at 931.) GX 411 presented an example of a bank doing precisely what defense counsel had accused Citigroup of failing to do – it researched a flagged transaction, and then added the concerning party to its sanctions filter.



NEW YORK BRANCH

Department of the Treasury  
Office of Foreign Assets Control  
1500 Pennsylvania Avenue NW  
Washington DC 20220

Vinay Jepal  
2 World Financial Center, New York, NY 10281-1050  
Telephone (212) 266-7200  
Fax (212) 266-7235  
[vinay.jepal@commerzbank.com](mailto:vinay.jepal@commerzbank.com)

June 16, 2011

**Re: Information Sharing – Stratus International Contracting Company**

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller

Board of Managing Directors: Martin Blessing (Chairman),

Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,

Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main

Registered Office: Frankfurt am Main Reg.No. 32000

VAT No. DE 114 103 514

**COMMERZBANK** 

NEW YORK BRANCH

**Re: Information Sharing – Stratus International Contracting Company– Page 2**

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG  
New York Branch



Deepa Keswani  
Head of AML/Anti-Fraud/Sanctions Compliance



Vinay Jepal  
Sanctions Compliance Officer

Encls.

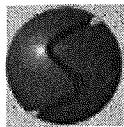
stratus intl payment

:LT Address :COBAUS3XA  
:transaction type :202 COVER bank tfr favour 3rd bank  
:input from :COBADEFF  
COMMERZBANK AG FRANKFURT  
HEAD OFFICE  
32-36 NEUE MAINZERSTRASSE  
60261 FRANKFURT GERMANY  
:validation Flag :COV}

{4: Text block:

:20 /transaction reference number :FAAS109400150500  
:21 /related reference :FAAS109400150500  
:32A/value date :040411 USD 29,442,967.57  
:52A/ordering institution - BIC :COBADEFF  
COMMERZBANK AG  
FRANKFURT AM MAIN  
:57A/account with inst - BIC :CHASUS33  
JPMORGAN CHASE BANK, N.A.  
NEW YORK, NY  
:58A/beneficiary inst - BIC :SHHBCHZZ  
HYPOSWISS PRIVATBANK AG, ZURICH  
ZURICH  
:50K/ordering customer :/400887746602USD  
BT/ FIDEICOMISO / FONDO CHINO  
VENEZOLANO. AV GUICAIPURO. URB EL  
ROSAL. TORRE BANCO DEL TESORO.  
CARACAS - VENEZUELA.  
:52A/ordering institution - BIC :BDTEVECA  
BANCO DEL TESORO, C.A. BANCO  
UNIVERSAL  
CARACAS  
:59 /beneficiary customer :/CH7708530519663100203  
STRATUS INTERNATIONAL CONTRACTING  
J.S.  
:70 /details of payment :REF: DESEMBOLSO NRO. 386 FONDO  
CHINO VENEZOLANO. CODIGO NRO.  
00579.  
:33B/amount :USD 29,442,967.57}

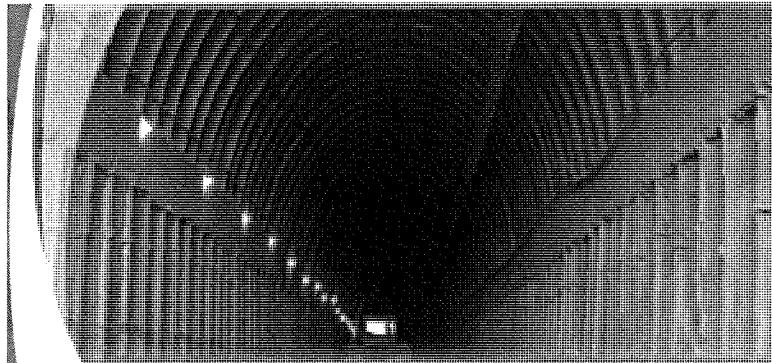
Entry : /SWIFT/ Date:110404 Time:02:44:17  
Info:1111/001781



**Stratus International  
Contracting Company**

فارسی | Staff Login | Site Map | Hon

STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



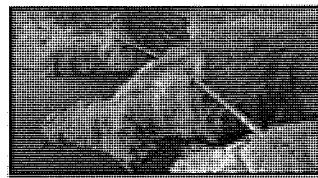
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

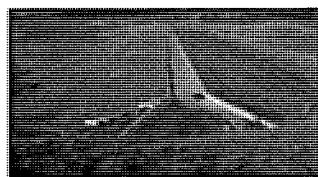
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
  - Federation of Contractors of Islamic Countries (F.C.I.C.)
  - Pakistan Engineering Council
  - International Chamber of Commerce (I.C.C.)
  - Iran – UK Chamber of Commerce
  - Iran – Canada Chamber of Commerce [Read more...](#)

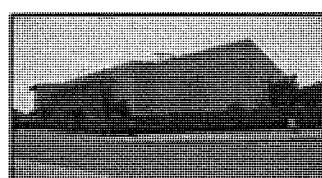
*Road & Railway*



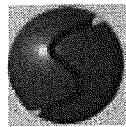
*Dam*



*Building*



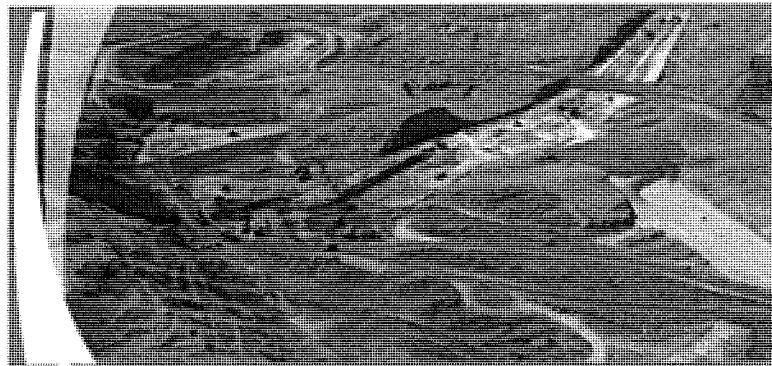
Contact



Stratus International  
Contracting Company

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---

Contact Us

---

**STRATUS International Contracting Co.**

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

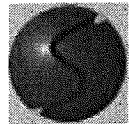
Fax: **(98) 21 8808 2882**

E-mail: **stratus@stratusgc.com**

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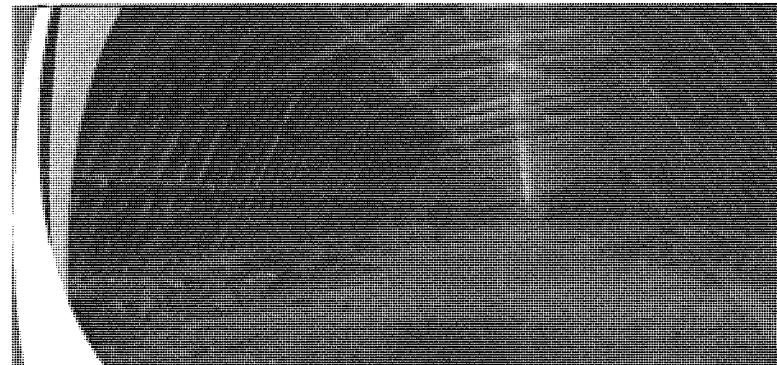
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Contracting Company**

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



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**Branch Offices**

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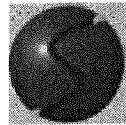
**Middle East**  
Iran  
Iraq

**CIS**  
Kazakhstan

**South America**  
Venezuela

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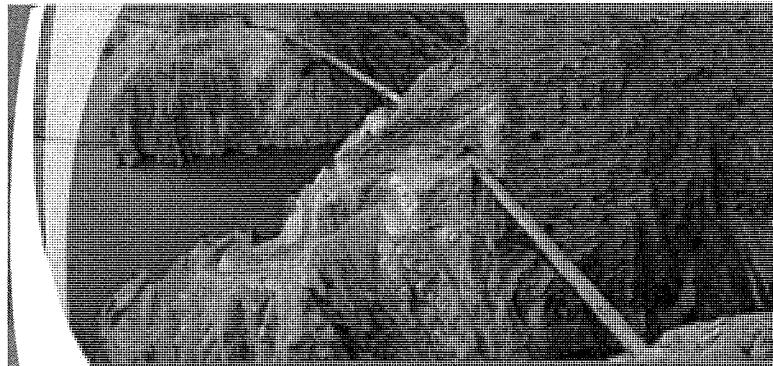
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**Stratus International**  
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.

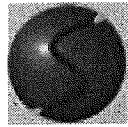


#### Sister Companies List

1. Samaneh Stratus (INVESTMENT CO.)
2. Iran Construction Investment Co.
3. Eghtesad - Novin Bank
4. Pishgaman Bazar Novin (BROKERAGE CO.)
5. Novin Insurance Co.
6. Pars Shahr Co.
7. Global Petro Tech CO.
8. Keyhan Tabadol Co.
9. Pars Hanza Aluminium CO.
10. Azarbaijan Industry Development Co.
11. Eghtesad Novin Investment CO.
12. Samaneh Gostar Novin

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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



### 7000 Units 'New Ojeda' Housing Development Project

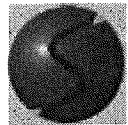
**Main Technical Features**

Site Gross Area : 318 Hec.  
 Concrete works : 520,000 m<sup>3</sup>  
 Net Construction Area : 850.000 m<sup>2</sup>  
 Water & Sewage network : 150 Km  
 Electrical network : 200 Km  
 Communication network : 220 Km  
 Gas network : 30 Km

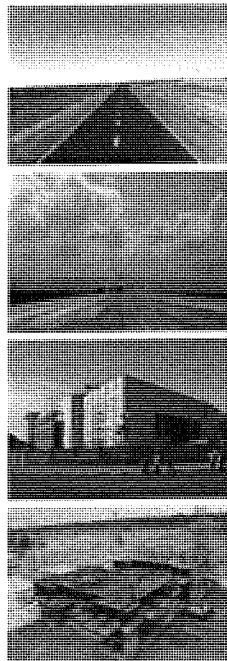
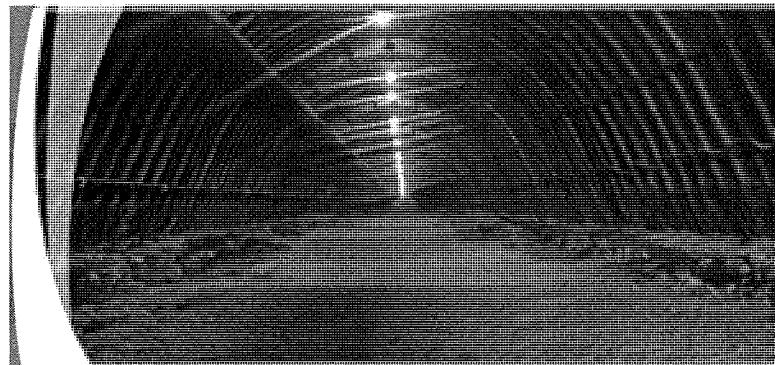
**Location** Ciudad Ojeda, Zulia State, Venezuela  
**Employer** Ducolsa 'Urban Development S.A'  
**Contract Duration** 48 Months  
**Date of Award** September 2009  
**Status** [ Under Construction ]



[\[Back to list\]](#)



STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.

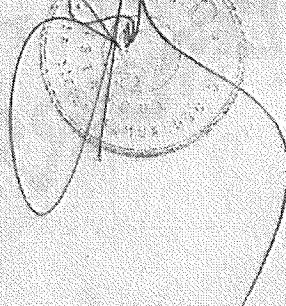
**Dalbandin – Nokkundi Highway - Section III-B**[Details >>](#)**Socotra Airport**[Details >>](#)**Design & Construction of Parliament Building & Commercial Center in Djibouti City**[Details >>](#)**7000 Units "New Ojeda" Housing Development Project**[Details >>](#)



(KADIKÖY)  
370857 - 2010T.C.  
İSTANBUL  
Ticaret Sicil Memurluğu

## SİCİL TASDIK NAMESİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükümlü şahısın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICİBAŞI
Tasdknamenin düzenlenenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN  
İSTANBUL TİCARET SİCİLİ  
MEMURU YARDIMCISI

The Honorable Alison J. Nathan, U.S.D.J.

March 8, 2020

Page 3

The Government regrets its error and is working to confirm that there is nothing else related to the Bank-1 investigation that has any bearing in this case, and that there have been no other omissions from the materials produced to the defense, both at the U.S. Attorney's Office and DANY. And, in light of our late disclosure of GX 411, we will not seek to offer it at trial. To the extent the defense wishes to offer GX 411 in its case, the Government has no objection and will stipulate to its admissibility. As a result, the defendant is not prejudiced by the late disclosure, and in light of the fact that they have not begun to present evidence, no curative instruction relating to the timing of the Government's disclosure is necessary.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_ /s/  
Jane Kim / Michael Krouse / Stephanie Lake  
Assistant United States Attorneys  
Garrett Lynch  
Special Assistant United States Attorney  
(212) 637-2038 / 2279 / 1066

cc: Defense Counsel (by ECF)

Brian M. Heberlig  
202 429 8134  
bheberlig@steptoe.com

Steptoe

1330 Connecticut Avenue, NW  
Washington, DC 20036-1795  
202 429 3000 main  
www.steptoe.com

March 8, 2020

By ECF

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *United States v. Ali Sadr Hashemi Nejad*, Case No. 18-cr-224 (AJN)

Dear Judge Nathan:

On behalf of Defendant Ali Sadr Hashemi Nejad, we write to request a curative instruction. We have conferred with the government who stated that it opposes this request.

On Saturday afternoon around 4:00 p.m., the government produced GX 411 (attached as Exhibit A), which had not been previously disclosed to the defense. GX 411 reveals that in connection with the first U.S. dollar payment in this case, the intermediary bank wrote a letter to OFAC disclosing certain information about the transactions. Among other things, the intermediary bank disclosed to OFAC that Stratus Turkey (Stratus International Contracting J.S.) was affiliated with Stratus Iran (Stratus International Contracting Company) and implied that the two companies were either unitary or cooperating on the Ojeda project in Venezuela. The intermediary bank attached Stratus Iran's website describing its ongoing work on the Ojeda project. The intermediary bank concluded that this information was not subject to mandatory disclosure as indicated by its note that it was "voluntarily informing OFAC." The government has not produced any response from OFAC and to defense counsel's knowledge, no response exists. *Cf.* Tr. 580, Test. of Ted Kim (Mar. 5, 2020) (agreeing that to his knowledge, "this matter was never investigated by OFAC").

GX 411 is exculpatory evidence that:

- Stratus Turkey's affiliation with Stratus Iran was not material either to OFAC or the intermediary banks;
- intermediary banks conducted independent investigation and could easily identify the affiliation between Stratus Turkey and Stratus Iran or even (erroneously)

The Honorable Alison J. Nathan  
March 8, 2020  
Page 2

Steptoe

conclude that the two companies were a single entity that “may be an Iranian company”; and

- neither the intermediary bank nor OFAC deemed the disparities in information about the two Stratus International Contractings working on the Ojeda project as important enough to stop U.S. dollar payments to Stratus International Contracting J.S.

The government should have disclosed GX 411 under *Brady*, *Giglio*, and Rule 16.

In light of the government’s failure to disclose this evidence before trial,<sup>1</sup> the defense respectfully requests a curative instruction. Based on a similar mid-trial disclosure in *United States v. Slough*, Judge Lamberth issued the curative instruction attached as Exhibit B. The defense has pasted that instruction below, edited only to reflect the facts of this case:

Government Exhibit 411 is a June 2011 letter regarding an April 2011 transaction involving Stratus International Contracting Company. You saw that evidence this morning instead of earlier in trial because the government failed to turn it over before trial as required by law. The defendant learned of that evidence on Saturday afternoon when the government disclosed it.

Tr. 6, *United States v. Slough*, No. 08-cr-360-RCL (D.D.C. Aug. 5, 2014) (relevant text highlighted in Ex. B). The defense requests that this instruction be read to the jury on Monday after GX 411 is admitted. The government opposes this request but does not object to the defense admitting this document in its case if the government chooses not to offer it.

Respectfully submitted,

/s/ Brian M. Heberlig

Reid H. Weingarten  
STEPTOE & JOHNSON LLP  
1114 Avenue of the Americas  
New York, NY 10036  
Tel: (212) 506-3900  
Fax: (212) 506-3950  
rweingarten@steptoe.com

---

<sup>1</sup> The government represents that it learned of this evidence in mid-January 2020 and that it came from an unrelated DANY investigation. The government states that it believed this document was part of the Commerzbank subpoena return that was produced in discovery. It was not.

The Honorable Alison J. Nathan  
March 8, 2020  
Page 3

Steptoe

Brian M. Heberlig (*Pro Hac Vice*)  
Bruce C. Bishop (*Pro Hac Vice*)  
David M. Fragale  
Nicholas P. Silverman (*Pro Hac Vice*)  
STEPTOE & JOHNSON LLP  
1330 Connecticut Avenue, N.W.  
Washington, DC 20036  
Tel: (202) 429-3000  
Fax: (202) 429-3902  
bheberlig@steptoe.com

*Counsel for Defendant Ali Sadr Hashemi Nejad*

cc: Counsel of Record (via ECF)

# **EXHIBIT 19**

---

**From:** [Bove, Emil \(USANYS\)](#)  
**To:** [Birger, Laura \(USANYS\)](#)  
**Cc:** [Crowley, Shawn \(USANYS\)](#)  
**Subject:** Re: Sadr trial - disclosure issue  
**Date:** Sunday, March 08, 2020 8:25:15 PM

---

Thank you. We'll definitely keep you updated.

On Mar 8, 2020, at 8:22 PM, Birger, Laura (USANYS) <[LBirger@usa.doj.gov](mailto:LBirger@usa.doj.gov)> wrote:

Thanks. I think the letter reads well (as does the email you sent below). Good luck tomorrow, and keep me posted.

Sent from my iPad

On Mar 8, 2020, at 7:53 PM, Bove, Emil (USANYS) <[EBove@usa.doj.gov](mailto:EBove@usa.doj.gov)> wrote:

As discussed with Laura, we wanted to flag a disclosure issue that arose this weekend in the Sadr trial before Judge Nathan. This is the Iranian sanctions case where DANY is a part of the prosecution team.

The issue relates to a document that DANY obtained in a separate investigation in 2015. The document is attached as GX 411. In January 2020, our DANY SAUSA emailed the document to the rest of the team during a discussion about a summary chart. At that time, our folks assumed incorrectly, and did not verify, that the document had already been produced to the defense. Late Saturday afternoon, a member of the team came across the document again, and viewed it as inculpatory to such an extent that the team emailed it to defense marked as a government exhibit, GX 411. During subsequent communications last night and this morning, defense counsel explained how the document supports their defense.

This afternoon, the defense filed the attached letter with Judge Nathan seeking a jury instruction about the untimely disclosure. Our response, which Judge Nathan directed us to file by 7, is also attached. Although we opposed the requested instruction, we conceded error, agreed not to offer GX 411 (which we still think is, on balance, very helpful to our case), and offered related authenticity and factual stipulations to the extent the defense wants to use the letter. Tonight, our team is scouring the case file -- here and at DANY -- to verify that we are in compliance with our disclosure obligations. They are also preparing to answer detailed factual questions from Judge Nathan tomorrow morning about the situation,

which we discussed during a team meeting after we filed the letter.

Sorry to be reporting this, especially on a Sunday night. We'll be in court with the team at the start of the day tomorrow, and will keep you updated. The team expects to rest tomorrow, and to do closings Tuesday or Wednesday depending on the length of the defense case and the scheduling of the charge conference.

[<Govt Letter.pdf>](#)

[<GX 411.pdf>](#)

[<Defense letter.pdf>](#)

# **EXHIBIT 20**

llan >

Sat, May 8, 7:27 PM



That bad?

In that it's a quasi Brady violation before Judge Nathan, yes

What happened??

Oh I figured you'd heard since Laura spoke to Geoff and Audrey

You'll be getting an email from us soon

No. I've been sequestered with Rafa since V's away.

It's not REALLY Brady. But it's close enough that it should have been produced.

I missed a call from Laura

Yeah.

Basically just a big oversight



Message



...

llan >

Did it actually only come in in January 2020? Did the team ever flag it?

It came to DANY several years ago

Garrett sent it to us in January

I can easily see it being the kind of thing that gets lost in the shuffle

The team assumed it had been produced but did not check

Ugh. Another casualty of absorbing a DANY casa.

And then steph was going thru emails yesterday and found it

Case.

And was like this is actually good for us

Checked and discovered we hadn't produced

So produced yesterday and said we plan to offer

And steptoe freaked



Message



...

llan >

Good for her. Are we sure there's nothing similar lurking?

Curse Stephanie and her diligence.

No, but the entire team is spending the rest of the night painstakingly scrubbing their tiles so they can be prepared to explain to AJN what they did

Including Garrett

Rough night.

We filed a letter, which Emil is going to send you all, that completely falls on the sword

It happens. And that seems like exactly the right approach.

llan &gt;

It totally happens. It was an oversight. Steptoe was pretty measured in calling us out. And I think Nathan will be reasonable and see that this was not us trying to suppress Brady

(Especially given that we intended to offer it)

And still will?

It's unfortunate timing with Schulte. But why can you do.

Totally.

No we are agreeing in the letter not to offer but will stipulate to admissibility if they want to

And stipulate that OFAC received it and did not take any action



To mitigate any purported prejudice

Anyway. Now you're up to speed!

Mon, Mar 8, 9:48 AM

How did it go this am?



Message



...



llan &gt;

Mon, Mar 9, 9:48 AM

How did it go this am?

That well?

Man

...

It's a long story. I'll tell you after the  
press confUpshot is there may be a mistrial  
but we are dealing w it

Wow. That's quite a remedy.

# **EXHIBIT 21**

---

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Bove, Emil \(USANYS\)](#); [Crowley, Shawn \(USANYS\)](#)  
**Cc:** [Lynch, Garrett](#); [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** FW: Order in 18cr224  
**Date:** Sunday, March 08, 2020 9:15:33 PM  
**Attachments:** [18cr224 Order 3.08.20.pdf](#)

---

**From:** Nathan NYSD Chambers <NathanNYSDChambers@nysd.uscourts.gov>  
**Sent:** Sunday, March 8, 2020 9:05 PM  
**To:** Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Bbishop\_steptoe.com <Bbishop@steptoe.com>; Fragale, David <DFragale@steptoe.com>; Levin, Michelle <mlevin@steptoe.com>; Silverman, Nicholas <nsilverman@steptoe.com>; Weingarten, Reid <RWeingarten@steptoe.com>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Heberlig, Brian <BHeberlig@steptoe.com>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday.  
Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

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**Sent:** Sunday, March 8, 2020 5:01 PM  
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**Subject:** RE: Order in 18cr224

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Alyssa O'Gallagher

Law Clerk to the Hon. Alison J. Nathan

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**Subject:** Order in 18cr224

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Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

United States of America,

—v—

Ali Sadr Hashemi Nejad,

Defendants.

18-cr-224 (AJN)

ORDER

ALISON J. NATHAN, District Judge:

In the letter filed this evening by the Government, Dkt. No. 275, the Government states that “It was only in the context of this process that the Government realized that GX 411 was not part of Bank-1’s subpoena production, which had been provided to the defense in discovery.”

The Court requires further explanation. Specifically, it is unclear from this sentence if the Government realized GX 411 had not been previously disclosed before or after the Government turned it over to the defense yesterday. Nor does this sentence indicate if, upon learning of the late disclosure, the Government informed defense counsel or not. The Government shall explain precisely when and how it realized that the document had erroneously been withheld and when, if at all, upon learning of the failure to disclose this was communicated to the defense.

Furthermore, the previously filed letter does not offer an explanation for how it came to be that GX 411 was not (though should have been) provided to the defense as part of Bank-1’s subpoena production.

The Government is ordered to address these points by letter to be filed no later than 10 p.m. this evening. The defense may reply to the Government’s letters by 11 p.m.

SO ORDERED.

Dated: March 8, 2020  
New York, New York

3/8/20

---

  
ALISON J. NATHAN  
United States District Judge

# **EXHIBIT 22**



Emil &gt;

Sun, Mar 8, 9:15 PM

This order from Nathan is ridiculous

9:16 PM

Jesus fucking Christ.

9:19 PM

55 minutes

9:19 PM

Ugh send the draft clowns

9:40 PM



GIPHY via imgur.com

Ugh where is it

9:47 PM

Oh man

10:04 PM

I just talked to steph again

10:04 PM

Call me when you have a sec

10:04 PM

I'm just waiting for the next ajn  
bomb right now

10:31 PM



Emil &gt;

nysd.uscourts.gov



11:05 PM



11:05 PM

127126528755.pdf

Says he "will testify"

11:05 PM

I still don't believe it but we probably should have talked to Garrett about cross

11:10 PM

Also, is this in opposition to Jane's letter last week?

11:11 PM

No they filed objections tonight

11:11 PM

Oh sorry

11:11 PM

Emil &gt;

11:13 PM

127126528759.pdf

Oh man

11:13 PM

Is this what Jane sent before I  
couldn't open it?

11:13 PM

Oops no ?

11:13 PM

Damn. I did not see this.

11:14 PM

Ugh

11:14 PM

"We now understand"

11:15 PM

Flat lie.

11:15 PM

Did you see their letter?

11:15 PM

They may ask for a mistrial or  
adjournment

11:16 PM

(They didn't say this I'm just  
guessing)

11:16 PM

Teeing up that there's a whole  
commerzbank database and we  
have no clue what's in it

11:17 PM



Message



1:21

24-AJN Document 401-2 Filed 02/22/21

Email

Little speechless here. Just have to weather it.

11:18 AM

Is it crazy to respond to that email and ask that they stay on the case file review? We said it once already. Maybe too much

11:19 AM

I probably wouldn't. We said it. I am afraid Jane is also going to drop and we just need manpower at this point

11:20 AM

Emil &gt;

I'm going to respond to her

11:32 PM

I'm so mad

11:32 PM

It's horrible wtf is wrong with her

11:32 PM

I get she's stressed too but this  
stuff is trickling in and they aren't  
telling us

11:32 PM

As in telling us the whole story

11:33 PM

That is such a fucking bitchy email

11:33 PM

Yes I'm blacking our looking st it

11:34 PM

This is now the third time we've  
learned a material fact about how  
this was turned over from Nathan or  
the defense

11:33 PM

True story

11:33 PM

# **EXHIBIT 23**

---

**From:** [Bove, Emil \(USANYS\)](#)  
**To:** [Kim, Jane \(USANYS\) 4](#)  
**Cc:** [Crowley, Shawn \(USANYS\)](#); [Lynch, Garrett](#); [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** Re: Order in 18cr224  
**Date:** Sunday, March 08, 2020 9:22:08 PM

---

Thanks guys. We're around to turn the draft.

On Mar 8, 2020, at 9:15 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

---

**From:** Nathan NYSD Chambers <[NathanNYSDChambers@nysd.uscourts.gov](mailto:NathanNYSDChambers@nysd.uscourts.gov)>  
**Sent:** Sunday, March 8, 2020 9:05 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Bbishop\_step toe.com <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
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Law Clerk to the Hon. Alison J. Nathan

<18cr224 Order 3.08.20.pdf>

# **EXHIBIT 24**

Company Name: US GOVT  
User name: harry calventas  
Structure name: Default  
Position: 987298206-00001

Report Name: Call detail - wireless number detail

Date from: Feb-20 Date to: Mar-20

## Call detail - local calls

Date	Time	In/Out	number	Rate	Usage type	Account authorization code	Origination	Destination	International call type	Duration	Airtime charges	Long distance/Other charges	Total call detail
3/6/2020	8:45 AM	3479201412	Peak	M2MAllow			Brooklyn	NY	Incoming	CL	N/A	0	0
3/6/2020	12:06 PM	6463181678	Peak	M2MAllow			New York	NY	Incoming	CL	N/A	0	0
3/7/2020	8:21 AM	6463410123	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	0	0
3/7/2020	9:04 AM	6463410123	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	0	0
3/7/2020	9:24 AM	8452204200	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	5	0
3/7/2020	9:32 AM	6468644277	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	6	0
3/7/2020	9:41 AM	6462857248	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	7	0
3/7/2020	9:47 AM	6468644277	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	3	0
3/7/2020	10:57 AM	6468644277	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	1	0
3/7/2020	11:16 AM	6468644277	Off-Peak	M2MAllow			New York	NY	Nwyrucz01	NY	N/A	5	0
3/7/2020	2:29 PM	6468644277	Off-Peak	N&W			New York	NY	Incoming	CL	N/A	12	0
3/7/2020	6:12 PM	6468644277	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	4	0
3/8/2020	4:55 PM	4079153946	Off-Peak	N&W			New York	NY	Incoming	CL	N/A	1	0
3/8/2020	9:21 PM	3479201412	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	1	0
3/8/2020	9:22 PM	3479201412	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	3	0
3/8/2020	9:27 PM	3476682048	Off-Peak	M2MAllow			Brooklyn	NY	New York	NY	N/A	3	0
3/8/2020	9:32 PM	3479201412	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	2	0
3/8/2020	9:33 PM	6466475005	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz01	NY	N/A	1	0
3/8/2020	9:35 PM	3476682048	Off-Peak	M2MAllow			Brooklyn	NY	New York	NY	N/A	2	0
3/8/2020	9:51 PM	3475854806	Off-Peak	N&W;ConfCall			Brooklyn	NY	Incoming	CL	N/A	3	0
3/8/2020	9:52 PM	6466475005	Off-Peak	M2MAllow;ConfCall			Brooklyn	NY	Nwyrucz01	NY	N/A	1	0
3/8/2020	9:53 PM	3476682048	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	6	0
3/8/2020	9:59 PM	3479201412	Off-Peak	M2MAllow			Brooklyn	NY	Nwyrucz05	NY	N/A	5	0
3/8/2020	10:04 PM	3476682048	Off-Peak	N&W;ConfCall			Brooklyn	NY	Incoming	CL	N/A	15	0
3/8/2020	10:07 PM	3472139637	Off-Peak	M2MAllow;ConfCall			Brooklyn	NY	Nwyrucz03	NY	N/A	13	0
3/8/2020	10:19 PM	3476682048	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	3	0
3/9/2020	8:08 AM	6466475005	Peak	M2MAllow			New York	NY	Nwyrucz01	NY	N/A	1	0
3/9/2020	8:09 AM	2128050278	Peak	PlanAllow			New York	NY	New York	NY	N/A	3	0
3/9/2020	8:16 AM	3476682048	Peak	M2MAllow			New York	NY	New York	NY	N/A	2	0
3/9/2020	11:58 PM	6463982239	Peak	M2MAllow			New York	NY	Nwyrucz01	NY	N/A	1	0
3/9/2020	5:21 PM	9176268272	Peak	M2MAllow			New York	NY	Incoming	CL	N/A	1	0
3/9/2020	9:21 PM	3476682048	Off-Peak	M2MAllow			New York	NY	New York	NY	N/A	1	0
3/9/2020	9:27 PM	3476682048	Off-Peak	N&W			New York	NY	Incoming	CL	N/A	2	0
3/10/2020	2:57 PM	5712353385	Peak	M2MAllow			New York	NY	Vm Deposit	CL	N/A	1	0
3/10/2020	3:41 PM	0	Peak	M2MAllow			New York	NY	Incoming	CL	N/A	5	0
3/10/2020	4:53 PM	4079153946	Peak	PlanAllow			New York	NY	Incoming	CL	N/A	1	0
3/10/2020	6:45 PM	9179214947	Peak	M2MAllow			New York	NY	Incoming	CL	N/A	1	0
3/10/2020	10:03 PM	2126372444	Off-Peak	N&W			Brooklyn	NY	New York	NY	N/A	2	0
3/10/2020	10:49 PM	3476682048	Off-Peak	N&W			Brooklyn	NY	Incoming	CL	N/A	3	0

Company Name: US GOVT  
User name: harry calventas  
Structure name: Default  
Position: 987298206-00001

Report Name: Call detail - wireless number detail

## Call detail - roaming calls

Date	Time	In/Out number	Rate	Usage type	Account authorization code	Origination	Destination	International call type	Duration	Airtime charges	Long distance/Other charges	Total call detail
Roaming	Calls Total								0	0	0	0

# **EXHIBIT 25**

12:31

24-AJN

Document 401-2 Filed 02/22/21

Stephanie >

Sun, Mar 8, 9:35 PM

Talked to Krouse. He's going to put  
her on, no problem

Tue, Mar 24, 6:57 PM

# **EXHIBIT 26**

---

**From:** Crowley, Shawn (USANYS)  
**To:** Bove, Emil (USANYS)  
**Cc:** Kim, Jane (USANYS) 4; Lynch, Garrett; Lake, Stephanie (USANYS); Krouse, Michael (USANYS); Lynch, Garrett (USANYS) [Contractor]  
**Subject:** Re: Order in 18cr224  
**Date:** Sunday, March 08, 2020 9:30:52 PM

---

Can you guys forward the transmittal email we sent to them when we produced the doc yesterday? Thanks

On Mar 8, 2020, at 9:22 PM, Bove, Emil (USANYS) <EBove@usa.doj.gov> wrote:

Thanks guys. We're around to turn the draft.

On Mar 8, 2020, at 9:15 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)> wrote:

---

**From:** Nathan NYSD Chambers  
<[NathanNYSDChambers@nysd.uscourts.gov](mailto:NathanNYSDChambers@nysd.uscourts.gov)>  
**Sent:** Sunday, March 8, 2020 9:05 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Bbishop\_step toe.com <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>  
**Subject:** RE: Order in 18cr224

Counsel,

Attached please find another Order from Judge Nathan that will appear on the docket on Monday. Please confirm receipt.

Sincerely,  
Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

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**From:** Nathan NYSD Chambers  
**Sent:** Sunday, March 8, 2020 5:01 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**Sent:** Sunday, March 8, 2020 4:04 PM  
**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** RE: Order in 18cr224

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Alyssa O'Gallagher  
Law Clerk to the Hon. Alison J. Nathan

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**From:** Nathan NYSD Chambers

**Sent:** Sunday, March 8, 2020 12:48 PM

**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

**Subject:** RE: Order in 18cr224

Counsel,

Please confirm receipt of this Order.

Sincerely,

Alyssa O'Gallagher

Law Clerk to the Hon. Alison J. Nathan

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**From:** Nathan NYSD Chambers

**Sent:** Sunday, March 8, 2020 12:41 PM

**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>

**Subject:** Order in 18cr224

Counsel,

Attached please find an Order from Judge Nathan that will appear on the docket on Monday.

Sincerely,

Alyssa O'Gallagher

Law Clerk to the Hon. Alison J. Nathan

<18cr224 Order 3.08.20.pdf>



# **EXHIBIT 27**

**From:** [Kim, Jane \(USANYS\) 4](#)  
**To:** [Crowley, Shawn \(USANYS\)](#); [Bove, Emil \(USANYS\)](#)  
**Cc:** [Lynch, Garrett](#); [Lake, Stephanie \(USANYS\)](#); [Krouse, Michael \(USANYS\)](#); [Lynch, Garrett \(USANYS\) \[Contractor\]](#)  
**Subject:** RE: Order in 18cr224  
**Date:** Sunday, March 08, 2020 9:41:18 PM  
**Attachments:** [U.S. v. Sadr.msg.msg](#)

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**From:** Crowley, Shawn (USANYS) <SCrowley@usa.doj.gov>  
**Sent:** Sunday, March 8, 2020 9:31 PM  
**To:** Bove, Emil (USANYS) <EBove@usa.doj.gov>  
**Cc:** Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>; Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Subject:** Re: Order in 18cr224

Can you guys forward the transmittal email we sent to them when we produced the doc yesterday?  
Thanks

On Mar 8, 2020, at 9:22 PM, Bove, Emil (USANYS) <[EBove@usa.doj.gov](#)> wrote:

Thanks guys. We're around to turn the draft.

On Mar 8, 2020, at 9:15 PM, Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](#)> wrote:

---

**From:** Nathan NYSD Chambers  
<[NathanNYSDChambers@nysd.uscourts.gov](#)>  
**Sent:** Sunday, March 8, 2020 9:05 PM  
**To:** Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](#)>; Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](#)>; [Bbishop\\_steptoe.com](#)  
<[Bbishop@steptoe.com](#)>; Fragale, David <[DFragale@steptoe.com](#)>; Levin, Michelle <[mlevin@steptoe.com](#)>; Silverman, Nicholas <[nsilverman@steptoe.com](#)>; Weingarten, Reid <[RWeingarten@steptoe.com](#)>; Lynch, Garrett <[LynchG@dany.nyc.gov](#)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](#)>; Heberlig, Brian <[BHeberlig@steptoe.com](#)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](#)>  
**Subject:** RE: Order in 18cr224

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Law Clerk to the Hon. Alison J. Nathan

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**Sent:** Sunday, March 8, 2020 5:01 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragment@steptoe.com](mailto:DFragment@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**To:** 'Kim, Jane (USANYS) 4' <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; 'Lake, Stephanie (USANYS)' <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; 'Fragale, David' <[DFragment@steptoe.com](mailto:DFragment@steptoe.com)>; 'Levin, Michelle' <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; 'Silverman, Nicholas' <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; 'Weingarten, Reid' <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; 'Lynch, Garrett' <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; 'Lynch, Garrett (USANYS) [Contractor]' <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; 'Heberlig, Brian' <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; 'Krouse, Michael (USANYS)' <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
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**Subject:** RE: Order in 18cr224

Counsel,

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Law Clerk to the Hon. Alison J. Nathan

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**Sent:** Sunday, March 8, 2020 12:41 PM  
**To:** Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; [Bbishop\\_steptoe.com](mailto:Bbishop_steptoe.com) <[Bbishop@steptoe.com](mailto:Bbishop@steptoe.com)>; Fragale, David <[DFragale@steptoe.com](mailto:DFragale@steptoe.com)>; Levin, Michelle <[mlevin@steptoe.com](mailto:mlevin@steptoe.com)>; Silverman, Nicholas <[nsilverman@steptoe.com](mailto:nsilverman@steptoe.com)>; Weingarten, Reid <[RWeingarten@steptoe.com](mailto:RWeingarten@steptoe.com)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Heberlig, Brian <[BHeberlig@steptoe.com](mailto:BHeberlig@steptoe.com)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>  
**Subject:** Order in 18cr224

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Law Clerk to the Hon. Alison J. Nathan  
<18cr224 Order 3.08.20.pdf>

3/12/20

Robert per (cont)

G. yard

Ex 432 discussed and  
contents

E. Eaton  
(cont)

Trial prep.

Blast

late, and 3/6

clarified answer to whether \$ was JP Morgan's

Conte

Farino, DePresto, Lahn 3/7/10

August 2011 - December 6, 2011

Contract - \$170,000

Sept. 7 - \$3416 USD deposit

End month, closed \$52,700 ~~was~~  $\rightarrow$  Balance \$83,300

Person who bought unit issued ~~was~~ a mortgage in Bolivars

Bank advanced Bolivar loan to her for mortgage value

Needed in USD. Buyer's father arranged transfer through exchange of

\$23,000 stayed in Bolivars

\$60,000 was balance of money owned

Prep

Cross

Logistics

---

**From:** Nevins, Talya <NevinsT@dny.nyc.gov>  
**Sent:** Wednesday, March 4, 2020 11:49 AM  
**To:** Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>  
**Cc:** Nelson, Matthew <NelsonM@dny.nyc.gov>  
**Subject:** RE: TRAVEL TO IRAN - Draft Chart

Hi Garrett,

I hope this morning is going well. As far as I'm concerned, the Iran travel summary chart (attached) is complete.

I did have to make a few judgment calls while verifying the chart against the underlying email exhibits. Specifically, some of the e-tickets have different dates for the purchase, the flight, and the ticket's NVA/NVB dates. Jane's chart was not always consistent about which date it listed for the trip. I chose to always use the Flight Date, except in one instance where there was an NVA date that came earlier than the "flight date" and the "flight date" in question was duplicative with a different e-ticket. I can explain this over the phone if need be.

Pending your final review and approval, this chart is ready to go for whenever you need it.

Talya

---

**From:** Nevins, Talya  
**Sent:** Tuesday, March 3, 2020 1:29 PM  
**To:** Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>  
**Cc:** Nelson, Matthew <[NelsonM@dny.nyc.gov](mailto:NelsonM@dny.nyc.gov)>  
**Subject:** TRAVEL TO IRAN - Draft Chart

Garrett,

Please find attached my draft of the Iran Travel Summary chart. It incorporates the passport analysis as well as the travel itinerary chart that Jane made based on the emails. It includes all dates that we know Sadr departed from or arrived in Tehran. Please let me know if you'd like it edited or formatted any differently.

Two questions:

1. As previously asked, should I go back to the original emails in order to verify the info included in Jane's chart?
2. I included a count for "total trips to/from Iran" (43). Jane's chart had an additional count for "round trips to and from Iran." I am not sure how she counted these "round trips." As of now I only included flights that were directly to or from Iran in my chart. I have a guess that her 'round trip' count included flights between locations that do not include Tehran (e.g. Tehran to London, London to Frankfurt, Frankfurt to Tehran). This flight pattern would not register as a round trip on the chart as I have it now, which would exclude that hypothetical 'London to Frankfurt' flight. I think it would be hard to verify that as a round trip unless the emails obviously show a connecting flight (e.g. Tehran-London, then London-Tehran with a layover in Frankfurt). Those types of connecting flights would not, however, register on the passport analysis. For the sake of consistency, I decided to only include flights that directly included Iran as a point of departure or arrival, recognizing that this could make it harder to count "round trips." When you look at the chart, please let me know if you think I should change this up.

Thank you,

**Talya R Nevins**

Paralegal, Major Economic Crimes Bureau  
Office of the New York County District Attorney  
80 Centre Street, 8<sup>th</sup> Floor  
New York, NY 10013  
Phone: 212-335-4353

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**From:** "Krouse, Michael (USANYS)" <MKrouse@usa.doj.gov>  
**Date:** March 5, 2020 at 7:41:50 PM EST  
**To:** "Nevins, Talya" <NevinsT@dany.nyc.gov>, "Lynch, Garrett (USANYS) [Contractor]" <GLynch@usa.doj.gov>, "Nelson, Matthew" <NelsonM@dany.nyc.gov>  
**Cc:** "Lake, Stephanie (USANYS)" <SLake@usa.doj.gov>, "Kim, Jane (USANYS) 4" <JKim4@usa.doj.gov>, "Lynch, Garrett" <LynchG@dany.nyc.gov>  
**Subject: RE: Exhibit for summary chart and existing spreadsheet**

Thanks Talya. For the charts by purpose, country, and beneficiary—can you bold the totals and shade them a different color so they stand out? Once you do that, I think we're good to go.

For the all payments chart, can you remove the shortened purpose column (that was just to put the pivot table together), and put the headings on the second page as well. Any way we can make the text bigger and more readable (by compressing the columns or other ways)?

Can you send them all back in PDF, and we'll then get them marked?

Thanks.

---

**From:** Nevins, Talya <NevinsT@dany.nyc.gov>  
**Sent:** Tuesday, March 3, 2020 9:47 AM  
**To:** Krouse, Michael (USANYS) <MKrouse@usa.doj.gov>; Lynch, Garrett (USANYS) [Contractor] <GLynch@usa.doj.gov>; Nelson, Matthew <NelsonM@dany.nyc.gov>  
**Cc:** Lake, Stephanie (USANYS) <SLake@usa.doj.gov>; Kim, Jane (USANYS) 4 <JKim4@usa.doj.gov>; Lynch, Garrett <LynchG@dany.nyc.gov>  
**Subject: RE: Exhibit for summary chart and existing spreadsheet**

Here you go. The Excel contains two tabs: 1. All Payments and 2. Breakdowns, which includes charts by purpose, country, and beneficiary. I also exported each of the four tables as its own PDF. All attached.

Let me know if you want anything changed or formatted differently.

Good luck this morning with opening!

---

**From:** Krouse, Michael (USANYS) [<mailto:Michael.Krouse@usdoj.gov>]  
**Sent:** Monday, March 2, 2020 9:25 PM

**To:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** RE: Exhibit for summary chart and existing spreadsheet

Yes, please send. Thanks!

---

**From:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>  
**Sent:** Monday, March 2, 2020 12:22 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** RE: Exhibit for summary chart and existing spreadsheet

Hi Michael,

The charts are done. Can I email them to you? I have them all in both excel and PDF formats.

I ended up doing two rows labeled 1 and 2 for the five payments that had two beneficiaries, as I thought the extra column made the chart too bulky, but can easily change it back if you prefer.

---

**From:** Krouse, Michael (USANYS) [<mailto:Michael.Krouse@usdoj.gov>]  
**Sent:** Friday, February 28, 2020 6:17 PM  
**To:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>; Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Kim, Jane (USANYS) 4 <[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** RE: Exhibit for summary chart and existing spreadsheet

Thanks, Talya. Yep, add the missing USD payment. Let's do columns for beneficiary 1, beneficiary 2 (which we'll leave blank if there was no second beneficiary). We can see how that looks.

---

**From:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>  
**Sent:** Friday, February 28, 2020 2:28 PM  
**To:** Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>; Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** RE: Exhibit for summary chart and existing spreadsheet

A few more questions about this chart, for whenever someone has a minute.

1. There is one more USD payment that is in the PDF, but not the original chart. The payment is identical in format to other USD payments that were included, and is the last USD payment in the PDF, leading me to believe that it was just left off. I added it to my chart, but if there's some reason it shouldn't be included, please let me know. The payment is found on p. 51 of the PDF.
2. There are 5 payments that list different names as "beneficiario" and "beneficiario final" (most only list "beneficiario"). The original chart only lists the name that is given for "beneficiario," and

leaves off the “beneficiario final.” Should I stick with this format? I can be more specific if necessary. Those payments are found on pp. 22, 25, 39, 44, and 51 of the PDF.

Talya

---

**From:** Lynch, Garrett (USANYS) [Contractor] [<mailto:Garrett.Lynch@usdoj.gov>]  
**Sent:** Friday, February 28, 2020 1:35 PM  
**To:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>; Krouse, Michael (USANYS) <[Michael.Krouse@usdoj.gov](mailto:Michael.Krouse@usdoj.gov)>;  
Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Kim, Jane (USANYS) 4  
<[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>  
**Subject:** RE: Exhibit for summary chart and existing spreadsheet

Just the USD payments. Thanks!

---

**From:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>  
**Sent:** Friday, February 28, 2020 1:33 PM  
**To:** Krouse, Michael (USANYS) <[MKrouse@usa.doj.gov](mailto:MKrouse@usa.doj.gov)>; Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[SLake@usa.doj.gov](mailto:SLake@usa.doj.gov)>; Kim, Jane (USANYS) 4 <[JKim4@usa.doj.gov](mailto:JKim4@usa.doj.gov)>; Lynch,  
Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor] <[GLynch@usa.doj.gov](mailto:GLynch@usa.doj.gov)>  
**Subject:** RE: Exhibit for summary chart and existing spreadsheet

Michael,

I am going through the 52-page PDF and verifying the charts you sent over before I make a new one. I noticed that in the 52-page PDF there are records relating to 48 USD payments (Clarity-Stratus-Benficiary) as well as 1 EUR payment (Stratus-Beneficiary) and 1 CAD payment (Stratus-Beneifciary). Only the 48 USD payments are included in the charts you sent. Do you want me to incorporate the EUR / CAD payments into the chart that I make for trial, or otherwise address them?

Thanks,

Talya

---

**From:** Krouse, Michael (USANYS) [<mailto:Michael.Krouse@usdoj.gov>]  
**Sent:** Thursday, February 27, 2020 7:56 PM  
**To:** Nevins, Talya <[NevinsT@dany.nyc.gov](mailto:NevinsT@dany.nyc.gov)>; Nelson, Matthew <[NelsonM@dany.nyc.gov](mailto:NelsonM@dany.nyc.gov)>  
**Cc:** Lake, Stephanie (USANYS) <[Stephanie.Lake@usdoj.gov](mailto:Stephanie.Lake@usdoj.gov)>; Kim, Jane (USANYS) 4  
<[Jane.Kim@usdoj.gov](mailto:Jane.Kim@usdoj.gov)>; Lynch, Garrett <[LynchG@dany.nyc.gov](mailto:LynchG@dany.nyc.gov)>; Lynch, Garrett (USANYS) [Contractor]  
<[Garrett.Lynch@usdoj.gov](mailto:Garrett.Lynch@usdoj.gov)>  
**Subject:** FW: Exhibit for summary chart and existing spreadsheet



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Telephone (212) 266-7200  
Fax (212) 266-7235  
[vinay.jepal@commerzbank.com](mailto:vinay.jepal@commerzbank.com)

June 16, 2011

**Re: Information Sharing – Stratus International Contracting Company**

Dear Sir/Madam:

Commerzbank AG, New York Branch (CBNY) would like to share the following information with OFAC. On April 20, 2011 CBNY's AML transaction monitoring system generated an alert, which involved a transaction for USD 29,442,967.57 value April 4, 2011.

The transaction was originated by Banco Del Tesoro, CA Banco Universal Caracas for its client BT / Fideicomiso / Fondo Chino Venezolano in Caracas, Venezuela. The beneficiary of the payment was Stratus International Contracting Company ("Stratus"), a client of Hyposwiss Privatbank AG, Zurich.

As per standard procedure, CBNY initiated a request for information to the remitting bank Banco Del Tesoro, CA Banco Universal Caracas, Venezuela to obtain details on both entities and their relationship. In the interim, CBNY conducted further due diligence and noted the following regarding Stratus from its website:

- Stratus was founded in 1978 in Tehran, Iran
- Stratus International specializes in providing contracting services to infrastructure projects such as roads, railways, dams, tunnels, airports and buildings.
- Stratus is presently working on a 7000 Apartment Unit "New Ojeda" Housing Development Project in Venezuela

On May 12, 2011, CBNY received a response from the bank in Caracas indicating the following:

- Stratus's physical address is Gardenya Plaza 5, K:3 D:3 (Floor 3, Suite3) 34758 Atasehir, Istanbul, Turkey
- Stratus is registered in Istanbul, Turkey (copy of the registration attached)
- Stratus provides construction services in Turkey, Dubai and Venezuela
- The purpose of the payment is for the construction of a 7000 apartment unit project "Proyecto Urbanismo Nueva Ciudad Fabricio Ojeda, in Ciudad Ojeda, Estado Zulia, Venezuela (same address as listed on Stratus' website)

Although Stratus is not listed as an SDN, and the payment does not indicate any direct involvement of Iran or with Iran, due to conflicting information between the website and the response forwarded by the bank in Caracas, CBNY believes it appropriate to share this information with OFAC since Stratus may be an Iranian Company.

Chairman of the Supervisory Board: Klaus-Peter Müller  
Board of Managing Directors: Martin Blessing (Chairman),  
Frank Annuscheit, Markus Beumer, Achim Kassow, Jochen Klösges,  
Michael Reuther, Stefan Schmittmann, Ulrich Sieber, Eric Strutz, Martin Zielke

Commerzbank Aktiengesellschaft, Frankfurt am Main  
Registered Office: Frankfurt am Main Reg.No. 32000  
VAT No. DE 114 103 514

**COMMERZBANK** 

NEW YORK BRANCH

**Re: Information Sharing – Stratus International Contracting Company– Page 2**

We have added Stratus into our sanctions filter to monitor any future payments. Please note that apart from this transaction, there have not been any other payments involving Stratus processed by CBNY to date.

The purpose of this letter is to report the good faith efforts of Commerzbank AG, New York Branch in complying with applicable OFAC requirements and voluntarily informing OFAC of any information received during its investigation into possible sanctions-related entities.

Should you have any further questions concerning this matter, please do not hesitate to contact the signatories below.

Respectfully,

Commerzbank AG  
New York Branch



Deepa Keswani  
Head of AML/Anti-Fraud/Sanctions Compliance



Vinay Jepal  
Sanctions Compliance Officer

Encls.

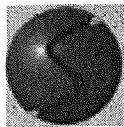
stratus intl payment

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:input from :COBADEFF  
COMMERZBANK AG FRANKFURT  
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60261 FRANKFURT GERMANY  
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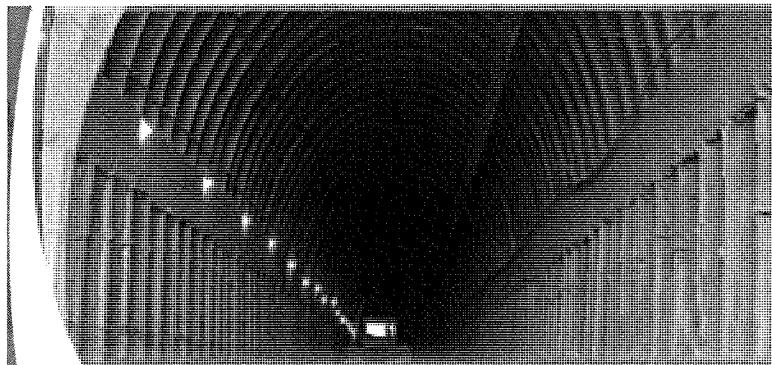
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:32A/value date :040411 USD 29,442,967.57  
:52A/ordering institution - BIC :COBADEFF  
COMMERZBANK AG  
FRANKFURT AM MAIN  
:57A/account with inst - BIC :CHASUS33  
JPMORGAN CHASE BANK, N.A.  
NEW YORK, NY  
:58A/beneficiary inst - BIC :SHHBCHZZ  
HYPOSWISS PRIVATBANK AG, ZURICH  
ZURICH  
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BT/ FIDEICOMISO / FONDO CHINO  
VENEZOLANO. AV GUICAIPURO. URB EL  
ROSAL. TORRE BANCO DEL TESORO.  
CARACAS - VENEZUELA.  
:52A/ordering institution - BIC :BDTEVECA  
BANCO DEL TESORO, C.A. BANCO  
UNIVERSAL  
CARACAS  
:59 /beneficiary customer :/CH7708530519663100203  
STRATUS INTERNATIONAL CONTRACTING  
J.S.  
:70 /details of payment :REF: DESEMBOLSO NRO. 386 FONDO  
CHINO VENEZOLANO. CODIGO NRO.  
00579.  
:33B/amount :USD 29,442,967.57}

Entry : /SWIFT/ Date:110404 Time:02:44:17  
Info:1111/001781



STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "Exemplary Exporters" of the year 1999 from his excellency Mr. president.



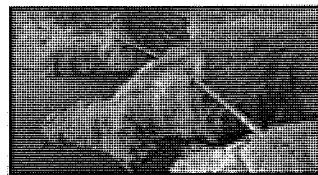
- STRATUS is an Engineering, Construction, Management and Contracting Company by specializing in the field of Building Construction, Road Works and Water Works.

STRATUS is Graded in three major categories: [Read more...](#)

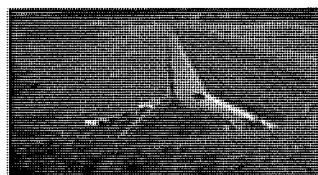
- STRATUS has succeeded to receive ISO 9001-2000 certificate for Quality Management System from MIC registered under UKAS, United Kingdom from 2004 which upgraded recently to ISO 9001-2008 in 2010 and intending to extend it by OHSAS 18001:2007. [Read more...](#)

- Our memberships:
  - Federation of Contractors of Islamic Countries (F.C.I.C.)
  - Pakistan Engineering Council
  - International Chamber of Commerce (I.C.C.)
  - Iran – UK Chamber of Commerce
  - Iran – Canada Chamber of Commerce [Read more...](#)

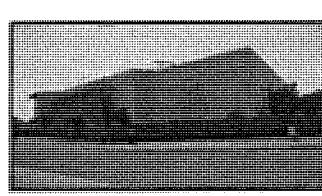
*Road & Railway*



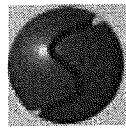
*Dam*



*Building*



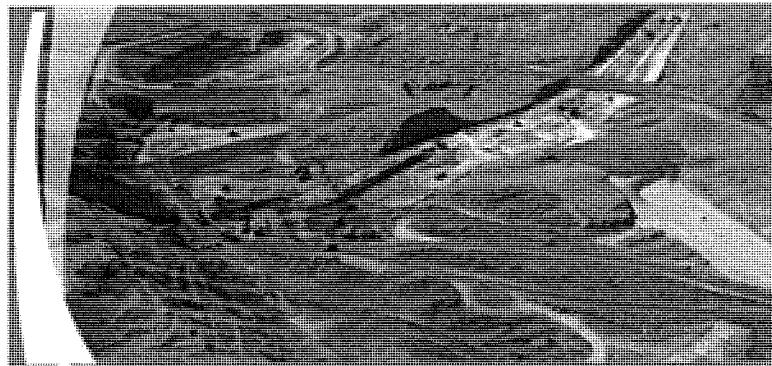
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Contact Us

---

**STRATUS International Contracting Co.**

Address: **No.35, Golestan St., Iran Zamin Ave., Shahrake Ghods, Tehran, Iran.**

Postal Code: **1465865187**

Tell: **(98) 21 8837 3100-6**

Fax: **(98) 21 8808 2882**

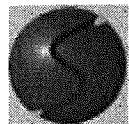
E-mail: **stratus@stratusgc.com**

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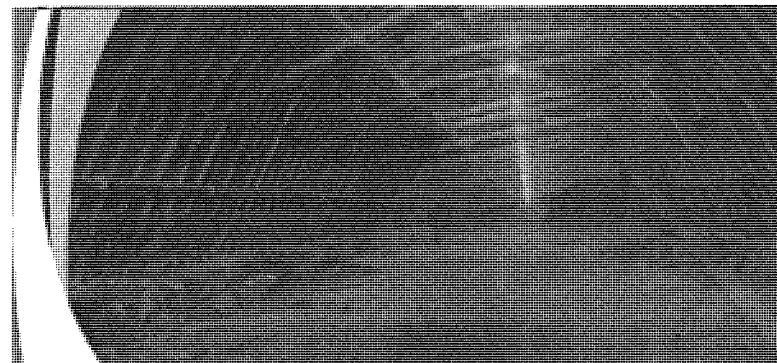
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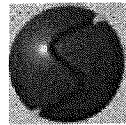
**Middle East**  
Iran  
Iraq

**CIS**  
Kazakhstan

**South America**  
Venezuela

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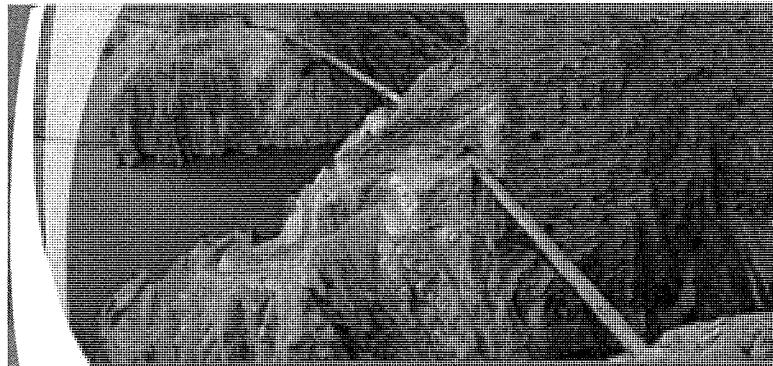
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1. Samaneh Stratus (INVESTMENT CO.)



2. Iran Construction Investment Co.



3. Eghtesad - Novin Bank

4. Pishgaman Bazar Novin (BROKERAGE CO.)



5. Novin Insurance Co.



6. Pars Shahr Co.



7. Global Petro Tech CO.



8. Keyhan Tabadol Co.



9. Pars Hanza Aluminium CO.



10. Azarbaijan Industry Development Co.

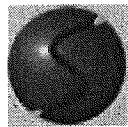
11. Eghtesad Novin Investment CO.



12. Samaneh Gostar Novin

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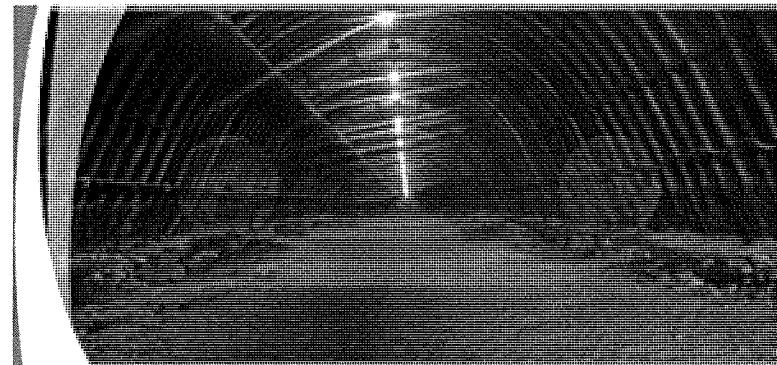
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### 7000 Units 'New Ojeda' Housing Development Project

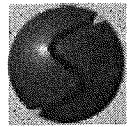
**Main Technical Features**

Site Gross Area : 318 Hec.  
 Concrete works : 520,000 m<sup>3</sup>  
 Net Construction Area : 850.000 m<sup>2</sup>  
 Water & Sewage network : 150 Km  
 Electrical network : 200 Km  
 Communication network : 220 Km  
 Gas network : 30 Km

**Location** Ciudad Ojeda, Zulia State, Venezuela  
**Employer** Ducolsa 'Urban Development S.A'  
**Contract Duration** 48 Months  
**Date of Award** September 2009  
**Status** [ Under Construction ]



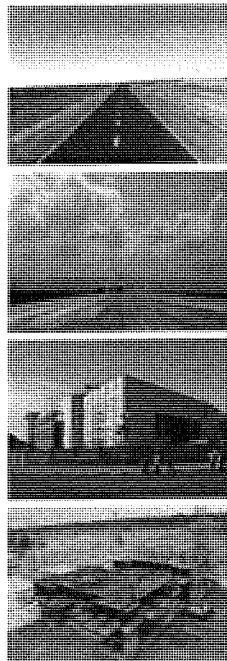
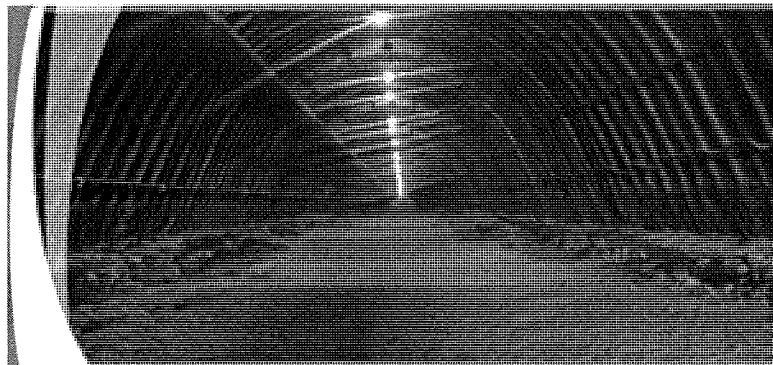
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STRATUS International Contracting Company has been founded in 1978 in Tehran, Iran, with registered paid up share capital of Rls 100 billions. STRATUS provides contracting services to infrastructure projects such as Roads, Railways, Dams, Tunnels, Airports and Buildings. Since 1994, STRATUS has been the first pioneered company in exporting Engineering and Technical Services in Iran and received "**Exemplary Exporters**" of the year 1999 from his excellency Mr. president.



**Dalbandin – Nokkundi Highway - Section III-B**

[Details >>](#)

**Socotra Airport**

[Details >>](#)

**Design & Construction of Parliament Building & Commercial Center in Djibouti City**

[Details >>](#)

**7000 Units "New Ojeda" Housing Development Project**

[Details >>](#)

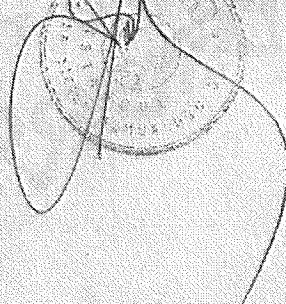
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(KADIKÖY)  
370857 - 2010T.C.  
İSTANBUL  
Ticaret Sicil Memurluğu

## SİCİL TASDIK NAMESİ

Ticaret Ünvanı	STRATUS INTERNATIONAL CONTRACTING İNŞAAT VE TAAHHÜT ANONİM ŞİRKETİ
Sicil No.	751671
Tescil Tarihi	22 / 10 / 2010
İşletme Merkezinin Adresi (Şubenin tescilinde şubenin Adresi ile beraber merkezin adresi de yazılır.)	GARDENYA PLAZA 5 K.3 D.3 ATAŞEHİR
İşletmenin uğraştığı işler	Ana sözleşmesinde yazılı olan işler
İşletme sahibinin hüviyeti (Hükmi şahıslarda, hükümlü şahsın mahiyeti)	Anonim
İşletme temsilcileri	38824643592 TC.No.1u CELAL TATLICİBAŞI
Tasdknamenin düzenlenenme Tarih ve Sayısı	22 EKİM 2010 - 39185

RECAİ SÖKMEN  
İSTANBUL TİCARET SİCİLİ  
MEMURU YARDIMCISI

# Business Account Application

WELLS  
FARGO

Bank Name: Wells Fargo Bank, N.A.	Store Name: MALIBU
Banker Name: MAKSIM KOLOMEYER	Officer/Portfolio Number: CG678
Banker Phone: 310/317-1740	Date: 101/26/2012
	Banker AU: 0001902
	Banker MAC: E2351-011
Store Number: 04649	

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## New Account Information

New Deposit Account(s) Only  New Deposit Account(s) and Business Credit Card

Account 1 Product Name

Expanded Business Services Package

COID: 114	Product: DDA	Account Number: 2807883273	Opening Deposit: \$1,000.00	Type of Funds: CKS
--------------	-----------------	-------------------------------	--------------------------------	-----------------------

New Account Kit:

Printed

## Authorized Signers

Business Name: PISTACHE LLC	Other Related Customer Name: 
Authorized Signer Name(s): SADEGH AMINIAN SEYED MOHSEN TORABI	PEGAH SADRHASHEMINEJAD



BBG2307 (11-11 SVP)

2W02-000469155618-01

GOVERNMENT

EXHIBIT

456

18 Cr. 224 (AJN)

Business Account Application

**Checking/Savings Statement Mailing Information**

Name(s) and Information Listed on Statement: PISTACHE LLC		Statement Mailing Address: 429 18TH ST
		Address Line 2:
		City: SANTA MONICA
		State: CA
		ZIP/Postal Code: 90402-2429
		Country: US

**Business Information**

Business Name: PISTACHE LLC		Street Address: 429 18TH ST
Taxpayer Identification Number (TIN): 45-4306973		TIN Type: EIN
Business Type: Limited Liability Company		Address Line 2:
Business Sub-Type: Non-Profit		Address Line 3:
Date Originally Established: 01/17/2012		Non-Profit No
Current Ownership Since: 1		City: SANTA MONICA
Number of Employees: 5		State: CA
ZIP/Postal Code: 90402-2429		Country: US
Annual Gross Sales: \$1,000,000.00		Fiscal Year End: 01/01/2012
Year Sales Reported: 01/01/2012		Business Phone: (310) 383-5459
Primary Financial Institution: 1		Fax: 1
Number of Locations: 1		Cellular Phone: 1
Sales Market: LOCAL		Pager: 1
Primary State 1: 1		e-Mail Address: 1
Primary State 2: 1		Website: 1
Primary Country 1: 1		Primary Country 2: 1
Primary Country 3: 1		Primary Country 3: 1

## Industry:

Agriculture, Forestry, Fishing and Hunting

## Description of Business:

Pistachio Farm

## Major Suppliers/Customers:

1

**Bank Use Only**

Name/Entity Verification: Articles of Organization		Address Verification: 1	BACC Reference Number: 612BAC5128026
Document Filing Number/Description: 201201810090		Filing Country: US	Filing State: CA
Filing Date: 01/17/2012		Expiration Date: 1	
Country of Registration: US		State of Registration: CA	
International Transactions: 1		Check Reporting: NO RECORD	
Internet Gambling Business No			



**Owner/Key Individual 1 Information**

Customer Name:  SADEGH AMINIAN		Residence Address: 429 18TH ST
Position/Title: OWNER	Date of Birth:  12/09/1958	Address Line 2:
Taxpayer Identification Number (TIN):  563-59-0567		TIN Type: SSN
Primary ID Type: DLIC	Primary ID Description:  C0033250	City: SANTA MONICA
Primary ID St/Ctry/Prov: CA	Primary ID Issue Date:  12/01/2009	Primary ID Expiration Date:  12/09/2014
ZIP/Postal Code: 90402-2429	State: CA	
Country: US	Secondary ID Type: OTHR DC	Secondary ID Description: WF VISA
Check Reporting: NO RECORD	Secondary ID State/Country: 	Secondary ID Issue Date:  07/01/2012
Secondary ID Expiration Date:  07/01/2012	Country of Citizenship:  US	

**Owner/Key Individual 2 Information**

Customer Name: PEGAH SADRHASHEMINEJAD		Residence Address: 1134 ALTA LOMA RD APT 303
Position/Title: PARTNER	Date of Birth:  02/10/1979	Address Line 2:
Taxpayer Identification Number (TIN):  141-06-3068		Address Line 3:
Primary ID Type: DLIC	Primary ID Description: S-362-680-007-108	City: WEST HOLLYWOOD
Primary ID St/Ctry/Prov: MD	Primary ID Issue Date:  10/07/2010	Primary ID Expiration Date:  02/10/2016
ZIP/Postal Code: 90069-2433	State: CA	
Country: US	Secondary ID Type: OTHR CC	Secondary ID Description: HSBC CC
Check Reporting: NO RECORD	Secondary ID State/Country: 	Secondary ID Issue Date:  01/01/2010
Secondary ID Expiration Date:  01/01/2013	Country of Citizenship: Permanently Resides in US:  IR YES	



## Owner/Key Individual 3 Information

Customer Name: <b>SEYED MOHSEN TORABI</b>		Residence Address: <b>3131 MICHELSON DR UNIT 1601</b>	
Position/Title: <b>OWNER</b>	Date of Birth: <b>09/20/1967</b>	Address Line 2:	
Taxpayer Identification Number (TIN): <b>624-85-8966</b>	TIN Type: <b>SSN</b>	Address Line 3:	
Primary ID Type: <b>DLIC</b>	Primary ID Description: <b>F2662158</b>	City: <b>IRVINE</b>	State: <b>CA</b>
Primary ID St/Ctry/Prov: <b>CA</b>	Primary ID Issue Date: <b>03/16/2011</b>	Primary ID Expiration Date: <b>03/10/2012</b>	ZIP/Postal Code: <b>92612-5666</b>
Secondary ID Type: <b>ALID PR</b>	Secondary ID Description: <b>061-381-569</b>	Country: <b>US</b>	
Secondary ID State/Country:	Secondary ID Issue Date: <b>03/10/2011</b>	Secondary ID Expiration Date: <b>03/10/2013</b>	Check Reporting: <b>NO RECORD</b>
Country of Citizenship: <b>IR</b>	Permanently Resides in US: <b>YES</b>		

## Certificate of Authority

Each person who signs the "Certified/Agreed To" section of this Application certifies that:

- A. The Customer's use of any Bank deposit account, product or service will confirm the Customer's receipt of, and agreement to be bound by, the Bank's applicable fee and information schedule and account agreement that includes the Arbitration Agreement under which any dispute between the Customer and the Bank relating to the Customer's use of any Bank deposit account, product or service will be decided in an arbitration proceeding before a neutral arbitrator as described in the Arbitration Agreement and not by a jury or court trial.**
- B. Each person who signs the "Certified/Agreed To" section of this Application or whose name, any applicable title and specimen signature appear in the "Authorized Signers - Signature Capture" section of this Application is authorized on such terms as the Bank may require to:**
  - (1) Enter into, modify, terminate and otherwise in any manner act with respect to accounts at the Bank and agreements with the Bank or its affiliates for accounts and/or services offered by the Bank or its affiliates (other than letters of credit or loan agreements);
  - (2) Authorize (by signing or otherwise) the payment of items from the Customer's account(s) listed on this Business Account Application (including without limitation any item payable to (a) the individual order of the person who authorized the item or (b) the Bank or any other person for the benefit of the person who authorized the item) and the endorsement of Deposited Items for deposit, cashing or collection (see the Bank's applicable account agreement for the definitions of "Item" and "Deposited Item");
  - (3) Give instructions to the Bank in writing (whether the instructions include the manual signature or a signature that purports to be the facsimile or other mechanical signature including a stamp of an Authorized Signer as the Customer's authorized signature without regard to when or by whom or by what means or in what ink color the signature may have been made or affixed), orally, by telephone or by any electronic means in regard to any item and the transaction of any business relating to the Customer's account(s), agreements or services, and the Customer shall indemnify and hold the Bank harmless for acting in accordance with such instructions; and
  - (4) Delegate the person's authority to another person(s) or revoke such delegation, in a separate signed writing delivered to the Bank.
- C. If a code must be communicated to the Bank in order to authorize an item, and the code is communicated, the item will be binding on the Customer regardless of who communicated the code.**
- D. Each transaction described in this Certificate of Authority conducted by or on behalf of the Customer prior to delivery of this Certificate is in all respects ratified.**
- E. If the Customer is a tribal government or tribal government agency, the Customer waives sovereign immunity from suit with respect to the Customer's use of any Bank account, product or service referred to in this Certificate.**
- F. The information provided in this Application is correct and complete, each person who signs the "Certified/Agreed To" section of this Application and each person whose name appears in the "Authorized Signers-Signature Capture" section of this Application holds any position indicated, and the signature appearing opposite the person's name is authentic.**
- G. The Customer has approved this Certificate of Authority or granted each person who signs the "Certified/Agreed To" section of this Application the authority to do so on the Customer's behalf by:**
  - (1) resolution, agreement or other legally sufficient action of the governing body of the Customer, if the Customer is not a trust or a sole proprietor;
  - (2) the signature of each of the Customer's trustee(s), if the Customer is a trust; or
  - (3) the signature of the Customer, if the Customer is a sole proprietor.



**Certified/Agreed To**Owner/Key Individual 1 Name  
SADEGH AMINIANPosition/Title:  
OWNER

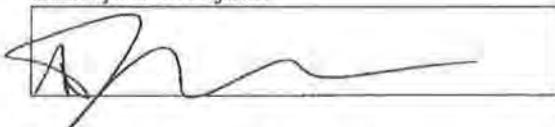
Owner/Key Individual 1 Signature



Submit manually  
 Signature not required

Date:  
01/26/2012Owner/Key Individual 2 Name  
PEGAH SADRHASHEMINEJADPosition/Title:  
PARTNER

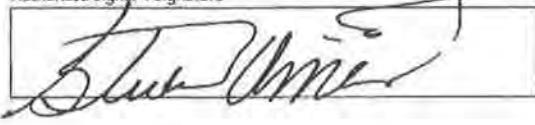
Owner/Key Individual 2 Signature



Submit manually  
 Signature not required

Date:  
01/26/2012**Authorized Signers - Signature Capture**Authorized Signer 1 Name  
SADEGH AMINIANPosition/Title:  
OWNER

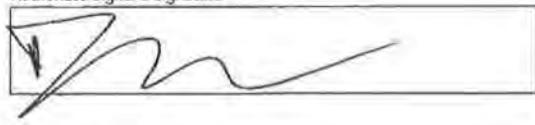
Authorized Signer 1 Signature



Submit manually  
 Signature not required

Date:  
01/26/2012Authorized Signer 2 Name  
PEGAH SADRHASHEMINEJADPosition/Title:  
PARTNER

Authorized Signer 2 Signature



Submit manually  
 Signature not required

Date:  
01/26/2012Authorized Signer 3 Name  
SEYED MOHSEN TORABIPosition/Title:  
OWNER

Authorized Signer 3 Signature



Submit manually  
 Signature not required

Date:  
01/26/2012

# Business Account Application

WELLS  
FARGO

Bank Name:  
Wells Fargo Bank, N.A.  
Banker Name:  
MARIE LOKMANYAN  
Banker Phone:  
310/853-6140

Store Name:  
West Hollywood  
Officer/Portfolio Number:  
CN616  
Date:  
01/23/2012  
Store Number:  
04232  
Banker AU:  
0000378  
Banker MAC:  
E2162-011

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## New Account Information

New Deposit Account(s) Only  New Deposit Account(s) and Business Credit Card

### Account 1 Product Name

#### Expanded Business Services Package

COID:	Product:	Account Number:	Opening Deposit:	Type of Funds:
174	BDA	6505709052	\$100.00	JCKS

### Account 2 Product Name

#### Business High Yield Savings

COID:	Product:	Account Number:	Opening Deposit:	Type of Funds:
174	BDA	2018893525	\$100.00	JCKS

New Account Kit:

Printed

## Authorized Signers

Business Name:

SAPENE LLC

Authorized Signer Name(s):

GAIL SADRISHMINIAD

Other Related Customer Name:



**Checking/Savings Statement Mailing Information**

Name(s) and Information Listed on Statement: SAPENE LLC		Statement Mailing Address: 1134 ALTA LOMA RD APT 303
		Address Line 2:
		City: WEST HOLLYWOOD
		State: CA
		ZIP/Postal Code: 90069-2433
		Country: US

**Business Information**

Business Name: SAPENE LLC		Street Address: 1134 ALTA LOMA RD APT 303
Taxpayer Identification Number (TIN): 45-4319694		TIN Type: EIN
Business Type: Limited Liability Company		Address Line 2:
Business Sub-Type: Non-Profit No		Address Line 3:
Date Originally Established: 07/10/2009	Current Ownership Since: 1	Number of Employees: 1
Annual Gross Sales: \$900,000.00	Year Sales Reported: 07/01/2010	Fiscal Year End:
Primary Financial Institution:	Number of Locations: 1	Business Phone: (412) 352-0363
Sales Market: NAICS		Fax: e-Mail Address:
Primary State 1:	Primary State 2:	Primary State 3:
Primary Country 1:	Primary Country 2:	Primary Country 3:

Industry:  
Agriculture, Forestry, Fishing and HuntingDescription of Business:  
AGRICULTURE PESTACTOSMajor Suppliers/Customers:  
STRATUS GLOBAL**Bank Use Only**

Name/Entity Verification: Articles of Organization	Address Verification:	BACC Reference Number: 1612BAC1313023
Document Filing Number/Description: 201201010064	Filing Country: US	Filing State: CA
Country of Registration: US	State of Registration: CA	Filing Date: 01/17/2012
	International Transactions:	Expiration Date: Check Reporting: NO RECORD
Internet Gambling Business: No		



2W02-000468357768-02

**Owner/Key Individual 1 Information**

Customer Name: <b>PEGAH FAKRIASHEMINEJAD</b>		Residence Address: <b>1134 ALTA LOMA RD APT 303</b>	
Position/Title: <b>FATHER</b>	Date of Birth: <b>02/10/1979</b>	Address Line 2:	
Taxpayer Identification Number (TIN): <b>141-06-34163</b>		TIN Type: <b>SSN</b>	Address Line 3:
Primary ID Type: <b>DLIC</b>	Primary ID Description: <b>S-362-680-007-108</b>	City: <b>WEST HOLLYWOOD</b>	State: <b>CA</b>
Primary ID St/Ctry/Prov: <b>CA</b>	Primary ID Issue Date: <b>10/07/2010</b>	Primary ID Expiration Date: <b>02/10/2016</b>	ZIP/Postal Code: <b>90069-2433</b>
Secondary ID Type: <b>OTHER CC</b>	Secondary ID Description: <b>HSBC CC</b>	Check Reporting: <b>NO RECORD</b>	Country: <b>US</b>
Secondary ID State/Country:	Secondary ID Issue Date: <b>01/01/2010</b>	Secondary ID Expiration Date: <b>01/01/2013</b>	
Country of Citizenship: <b>IR</b>	Permanently Resides in US: <b>YES</b>		

**Certificate of Authority**

Each person who signs the "Certified/Agreed To" section of this Application certifies that:

- A. The Customer's use of any Bank deposit account, product or service will confirm the Customer's receipt of, and agreement to be bound by, the Bank's applicable fee and information schedule and account agreement that includes the Arbitration Agreement under which any dispute between the Customer and the Bank relating to the Customer's use of any Bank deposit account, product or service will be decided in an arbitration proceeding before a neutral arbitrator as described in the Arbitration Agreement and not by a jury or court trial.
- B. Each person who signs the "Certified/Agreed To" section of this Application or whose name, any applicable title and specimen signature appear in the "Authorized Signers - Signature Capture" section of this Application is authorized on such terms as the Bank may require to:
  - (1) Enter into, modify, terminate and otherwise in any manner act with respect to accounts at the Bank and agreements with the Bank or its affiliates for accounts and/or services offered by the Bank or its affiliates (other than letters of credit or loan agreements);
  - (2) Authorize (by signing or otherwise) the payment of items from the Customer's account(s) listed on this Business Account Application (including without limitation any item payable to (a) the individual order of the person who authorized the item or (b) the Bank or any other person for the benefit of the person who authorized the item) and the endorsement of Deposited Items for deposit, cashing or collection (see the Bank's applicable account agreement for the definitions of "Item" and "Deposited Item");
  - (3) Give instructions to the Bank in writing (whether the instructions include the manual signature or a signature that purports to be the facsimile or other mechanical signature including a stamp of an Authorized Signer as the Customer's authorized signature without regard to when or by whom or by what means or in what ink color the signature may have been made or affixed), orally, by telephone or by any electronic means in regard to any item and the transaction of any business relating to the Customer's account(s), agreements or services, and the Customer shall indemnify and hold the Bank harmless for acting in accordance with such instructions; and
  - (4) Delegate the person's authority to another person(s) or revoke such delegation, in a separate signed writing delivered to the Bank.
- C. If a code must be communicated to the Bank in order to authorize an item, and the code is communicated, the item will be binding on the Customer regardless of who communicated the code.
- D. Each transaction described in this Certificate of Authority conducted by or on behalf of the Customer prior to delivery of this Certificate is in all respects ratified.
- E. If the Customer is a tribal government or tribal government agency, the Customer waives sovereign immunity from suit with respect to the Customer's use of any Bank account, product or service referred to in this Certificate.
- F. The information provided in this Application is correct and complete, each person who signs the "Certified/Agreed To" section of this Application and each person whose name appears in the "Authorized Signers - Signature Capture" section of this Application holds any position indicated, and the signature appearing opposite the person's name is authentic.
- G. The Customer has approved this Certificate of Authority or granted each person who signs the "Certified/Agreed To" section of this Application the authority to do so on the Customer's behalf by:
  - (1) resolution, agreement or other legally sufficient action of the governing body of the Customer, if the Customer is not a trust or a sole proprietor;
  - (2) the signature of each of the Customer's trustee(s), if the Customer is a trust; or
  - (3) the signature of the Customer, if the Customer is a sole proprietor.



2W02-000468357768-03

**Certified/Agreed To**

Owner/Key Individual 1 Name  
PEGAH SADRHASHEMINEJAD

Position/Title:  
PARTNER

Owner/Key Individual 1 Signature



Submit manually  
 Signature not required

Date:  
01/23/2012

**Request for Taxpayer Identification Number and Certification**

(Substitute Form W-9)

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. UNLESS I HAVE CHECKED ONE OF THE BOXES BELOW, I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding (does not apply to real estate transactions, mortgage interest paid, the acquisition or abandonment of secured property, contributions to an Individual Retirement Arrangement (IRA), and payment other than interest and dividends).

3. I am a U.S. person (including a U.S. resident alien).  I am subject to backup withholding  I am exempt from backup withholding

**Note: The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.**

Business Name:

SAPENF LLC

Taxpayer Identification Number (TIN):  
145-4319695

TIN Certification Signature:



Submit manually  
 Signature not required

Date:  
01/23/2012

**Authorized Signers - Signature Capture**

Authorized Signer 1 Name  
PEGAH SADRHASHEMINEJAD

Position/Title:  
PARTNER

Authorized Signer 1 Signature



Submit manually  
 Signature not required

Date:  
01/23/2012



2W02-000468357768-04

# Addendum To Certificate Of Authority

For Changes To Authorized Signers On Business Deposit Accounts



Host Status:

Host Update Successful

Bank Name:	Store Name:		
WELLS FARGO BANK, N.A.	CEDARS SINAI		
Banker Name:	Officer/Portfolio Number:	Date:	
NOONIK TARVERDIAN	C7627	10/01/2013	
Banker Phone:	Store Number:	Banker AU:	Banker MAC:
310/657-3951	04498	0000807	E2164-011

Use this Addendum when Authorized Signers are being added or deleted to a Certificate of Authority currently on file for a business customer and a new, signed Certificate of Authority has not been obtained.

## Business/Account Information

Business Name:	COID:	Product:	Account Number:
SAPENE LLC	114	DDA	2018893525

## Authorized Signers

Authorized Signer Name(s):	Relationship Status:
PEGAH SADRHASHEMINEJAD	<input checked="" type="checkbox"/> Existing/Remaining <input type="checkbox"/> New <input type="checkbox"/> Delete
ALI SADR	<input type="checkbox"/> Existing/Remaining <input checked="" type="checkbox"/> New <input type="checkbox"/> Delete

## Addendum to Certificate of Authority

Original Certificate of Authority Dated:	Addendum to Certificate of Authority Dated:
01/17/2012	10/01/2013

Each person signing in the "Certified/Agreed To" section below:

- directs the Bank that the additional Authorized Signers shall have all of the authority granted to the persons identified as Authorized Signers on the Certificate of Authority, including without limitation the authority to instruct the Bank in writing (whether the instructions include the manual signature or a signature that purports to be the facsimile or other mechanical signature including a stamp of an Authorized Signer as the Customer's authorized signature without regard to when or by whom or by what means or in what ink color the signature may have been made or affixed), orally, by telephone or by electronic means in regard to any item and the transaction of any business relating to the Customer's account(s), agreements or services;
- directs the Bank to discontinue acting on the instructions of any person who has been deleted as an Authorized Signer;
- acknowledges that these modifications become effective only after this Addendum has been received by the Bank and the Bank has had a reasonable opportunity to act on it; and
- certifies that the account owner has taken all action under its organizational documents, if any, including passage of resolutions by its board of directors, trustees, or other governing body, required to make these modifications and to authorize the undersigned to execute and deliver this Addendum.



BBG5351 (8-07 SVP)

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2W02-000596850008-01

Page 1 of 2

Wells Fargo Confidential

**Certified/Agreed To**

Owner/Key Individual 1 Name  
PEGAH SADR HASHEMINEJAD

Position/Title:  
PARTNER

Owner/Key Individual 1 Signature



Submit manually  
 Signature not required

Date:  
10/01/2013

**Signature Capture - New Authorized Signers**

New Authorized Signer 1 Name  
ALI SADR

Position/Title:  
mgr partner

New Authorized Signer 1 Signature



Submit manually  
 Signature not required

Date:  
10/01/2013



BBG5351 (8-07 SVP)

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2W02-000596850008-02

Page 2 of 2

Wells Fargo Confidential

# Business Account Application



Bank Name:	Store Name:		
Wells Fargo Bank, N.A.	MALIBU		
Banker Name:	Officer/Portfolio Number:		Date:
ARASH DOUNEL	A1054		09/07/2011
Banker Phone:	Store Number:	Banker AU:	Banker MAC:
310/317-1740	04649	0001902	E2351-011

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## New Account Information

New Deposit Account(s) Only  New Deposit Account(s) and Business Credit Card

### Account 1 Product Name

Expanded Business Services Package

COID:	Product:	Account Number:	Opening Deposit:	Type of Funds:
114	DDA	3803666647	\$9,900.00	INTX

### Account 2 Product Name

Business High Yield Savings

COID:	Product:	Account Number:	Opening Deposit:	Type of Funds:
114	DDA	2504476439	\$100.00	INTX

### New Account Kit:

b20110404-0007329203

## Authorized Signers

Business Name:	Other Related Customer Name:
SETOMA LLC	

### Authorized Signer Name(s):

SADEGH AMINIAN	SEYED MOHSEN TORABI
PEGAH SADRHASHEMINEJAD	



Business Account Application

**Checking/Savings Statement Mailing Information**

Name(s) and Information Listed on Statement:  SETOMA LLC	Statement Mailing Address:  429 18TH ST
	Address Line 2:
	City: SANTA MONICA State: CA
	ZIP/Postal Code: 90402-2429 Country: US

**Business Information**

Business Name:  SETOMA LLC	Street Address:  429 18TH ST
Taxpayer Identification Number (TIN):  45-3042794	TIN Type:  EIN
Business Type:  Limited Liability Company	Address Line 2:  Address Line 3:
Business Sub-Type:  Non-Profit No	City: SANTA MONICA State: CA
Date Originally Established:  08/17/2011	Current Ownership Since:  3
Number of Employees:  3	ZIP/Postal Code:  90402-2429 Country: US
Annual Gross Sales:  \$1,000,000.00	Year Sales Reported:  08/01/2011
Fiscal Year End:  /	Business Phone:  (818) 905-9105
Primary Financial Institution:  1	Fax:  /
Sales Market:  LOCAL	Cellular Phone:  /
Primary State 1:  /	Primary State 2:  /
Primary State 3:  /	Primary Country 1:  /
Primary Country 2:  /	Primary Country 3:  /
Industry:  Agriculture, Forestry, Fishing and Hunting	e-Mail Address:  /
Description of Business:  Pistachio Farming	Website:  /
Major Suppliers/Customers:  /	

**Bank Use Only**

Name/Entity Verification:  Articles of Organization	Address Verification:  /	BACC Reference Number:  611BAC2429250
Document Filing Number/Description:  201123010001	Filing Country: US Filing State: CA	Filing Date: 08/17/2011
Country of Registration:  US	State of Registration:  CA	International Transactions:  /
Internet Gambling Business No		Expiration Date:  /
		Check Reporting:  NO RECORD



Business Account Application

**Owner/Key Individual 1 Information**

Customer Name: SADEGH AMINIAN	Primary ID Type: DLIC	Primary ID Description: C0033250
Position/Title: OWNER	Primary ID St/Ctry/Prov: CA	Primary ID Issue Date: 12/01/2009 Primary ID Expiration Date: 12/09/2014
Check Reporting: NO RECORD	Secondary ID Type: OTHR DC	Secondary ID Description: WF VISA
	Secondary ID State/Country:	Secondary ID Issue Date: Secondary ID Expiration Date: 07/01/2012

**Owner/Key Individual 2 Information**

Customer Name: SEYED MOHSEN TORABI	Primary ID Type: ALID PR	Primary ID Description: 061-381-569
Position/Title: OWNER	Primary ID St/Ctry/Prov: CA	Primary ID Issue Date: 03/10/2011 Primary ID Expiration Date: 03/10/2013
Check Reporting: NO RECORD	Secondary ID Type: OTHR CC	Secondary ID Description: CITI CC
	Secondary ID State/Country:	Secondary ID Issue Date: Secondary ID Expiration Date: 10/01/2010 12/01/2014

**Owner/Key Individual 3 Information**

Customer Name: PEGAH SADRHASHEMINEJAD	Primary ID Type: DLIC	Primary ID Description: S-362-680-007-108
Position/Title: PARTNER	Primary ID St/Ctry/Prov: MD	Primary ID Issue Date: 10/07/2010 Primary ID Expiration Date: 02/10/2016
Check Reporting: NO RECORD	Secondary ID Type: OTHR CC	Secondary ID Description: HSBC CC
	Secondary ID State/Country:	Secondary ID Issue Date: Secondary ID Expiration Date: 01/01/2010 01/01/2013



**Certificate of Authority**

Each person who signs the "Certified/Agreed To" section of this Application certifies that:

**A. The Customer's use of any Bank deposit account, product or service will confirm the Customer's receipt of, and agreement to be bound by, the Bank's applicable fee and information schedule and account agreement that includes the Arbitration Agreement under which any dispute between the Customer and the Bank relating to the Customer's use of any Bank deposit account, product or service will be decided in an arbitration proceeding before a neutral arbitrator as described in the Arbitration Agreement and not by a jury or court trial.**

**B. Each person who signs the "Certified/Agreed To" section of this Application or whose name, any applicable title and specimen signature appear in the "Authorized Signers - Signature Capture" section of this Application is authorized on such terms as the Bank may require to:**

- (1) Enter into, modify, terminate and otherwise in any manner act with respect to accounts at the Bank and agreements with the Bank or its affiliates for accounts and/or services offered by the Bank or its affiliates (other than letters of credit or loan agreements);
- (2) Authorize (by signing or otherwise) the payment of items from the Customer's account(s) listed on this Business Account Application (including without limitation any item payable to (a) the individual order of the person who authorized the item or (b) the Bank or any other person for the benefit of the person who authorized the item) and the endorsement of Deposited Items for deposit, cashing or collection (see the Bank's applicable account agreement for the definitions of "item" and "Deposited Item");
- (3) Give instructions to the Bank in writing (whether the instructions include the manual signature or a signature that purports to be the facsimile or other mechanical signature including a stamp of an Authorized Signer as the Customer's authorized signature without regard to when or by whom or by what means or in what ink color the signature may have been made or affixed), orally, by telephone or by any electronic means in regard to any item and the transaction of any business relating to the Customer's account(s), agreements or services, and the Customer shall indemnify and hold the Bank harmless for acting in accordance with such instructions; and
- (4) Delegate the person's authority to another person(s) or revoke such delegation, in a separate signed writing delivered to the Bank.

**C. If a code must be communicated to the Bank in order to authorize an item, and the code is communicated, the item will be binding on the Customer regardless of who communicated the code.**

**D. Each transaction described in this Certificate of Authority conducted by or on behalf of the Customer prior to delivery of this Certificate is in all respects ratified.**

**E. If the Customer is a tribal government or tribal government agency, the Customer waives sovereign immunity from suit with respect to the Customer's use of any Bank account, product or service referred to in this Certificate.**

**F. The information provided in this Application is correct and complete, each person who signs the "Certified/Agreed To" section of this Application and each person whose name appears in the "Authorized Signers-Signature Capture" section of this Application holds any position indicated, and the signature appearing opposite the person's name is authentic.**

**G. The Customer has approved this Certificate of Authority or granted each person who signs the "Certified/Agreed To" section of this Application the authority to do so on the Customer's behalf by:**

- (1) resolution, agreement or other legally sufficient action of the governing body of the Customer, if the Customer is not a trust or a sole proprietor;
- (2) the signature of each of the Customer's trustee(s), if the Customer is a trust; or
- (3) the signature of the Customer, if the Customer is a sole proprietor.

**Certified/Agreed To**

Owner/Key Individual 1 Name  
SADEGH AMINIAN

Position/Title:  
OWNER

Owner/Key Individual 1 Signature



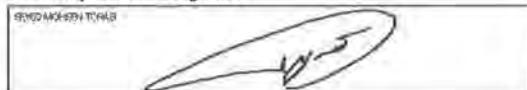
Submit manually  
 Signature not required

Date:  
09/07/2011

Owner/Key Individual 2 Name  
SEYED MOHSEN TORABI

Position/Title:  
OWNER

Owner/Key Individual 2 Signature



Submit manually  
 Signature not required

Date:  
09/07/2011



2W02-000446854308-04

**Request for Taxpayer Identification Number and Certification**

(Substitute Form W-9)

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. UNLESS I HAVE CHECKED ONE OF THE BOXES BELOW, I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding (does not apply to real estate transactions, mortgage interest paid, the acquisition or abandonment of secured property, contributions to an Individual Retirement Arrangement (IRA), and payment other than interest and dividends).
3. I am a U.S. person (including a U.S. resident alien).  I am subject to backup withholding  I am exempt from backup withholding

**Note: The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.**

Business Name:

SETOMA LLC

Taxpayer Identification Number (TIN):

45-3042794

TIN Certification Signature:


 Submit manually  
 Signature not required

 Date:  
 09/07/2011
**Authorized Signers - Signature Capture**

Authorized Signer 1 Name

SADEGH AMINIAN

Position/Title:

OWNER

Authorized Signer 1 Signature


 Submit manually  
 Signature not required

 Date:  
 09/07/2011

Authorized Signer 2 Name

SEYED MOHSEN TORABI

Position/Title:

OWNER

Authorized Signer 2 Signature


 Submit manually  
 Signature not required

 Date:  
 09/07/2011

Authorized Signer 3 Name

PEGAH SADRHASHEMINEJAD

Position/Title:

PARTNER

Authorized Signer 3 Signature


 Submit manually  
 Signature not required

 Date:  
 09/07/2011


2W02-000446854308-05

# Business Account Application



Bank Name:	Store Name:		
WELLS FARGO BANK, N.A.	CEDARS SINAI		
Banker Name:	Officer/Portfolio Number:	Date:	
MARIE LOKMANYAN	CN616	12/14/2012	
Banker Phone:	Store Number:	Banker AU:	Banker MAC:
310/657-3951	04498	0000807	E2164-011

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## New Account Information

New Deposit Account(s) Only  New Deposit Account(s) and Business Credit Card

Account 1 Product Name:

Wells Fargo Business High Yield Savings

COID:	Product:	Account Number:	Opening Deposit:	Type of Funds:
114	DDA	9221977151	\$100.00	CASH

Account 2 Product Name:

Gold Business Services Package

COID:	Product:	Account Number:	Opening Deposit:	Type of Funds:
114	DDA	9016420896	\$100.00	CKS

New Account Kit

Printed

## Related Customer Information

Customer 1 Name:	Account Relationship:
SLAG CONST LLC	Sole Owner
Enterprise Customer Number (ECN):	
324546792249215	
Customer 2 Name:	Account Relationship:
PEGAH SADRHASHEMINEJAD	Signer
Enterprise Customer Number (ECN):	
228421802054710	



**Checking/Savings Statement Mailing Information**

Name(s) and Information Listed on Statement:    SLAG CONST LLC		Statement Mailing Address:  1134 ALTA LOMA RD APT 303
		Address Line 2:
		City: WEST HOLLYWOOD
		State: CA
		ZIP/Postal Code: 90069-2433
		Country: US

**Customer 1 Information**

Customer Name:    SLAG CONST LLC		Street Address:  1134 ALTA LOMA RD APT 303
Account Relationship:    Sole Owner		Address Line 2:
Taxpayer Identification Number (TIN): TIN Type:    45-4292603   EIN		Address Line 3:
Business Type:    Limited Liability Company		City: WEST HOLLYWOOD
Business Sub-Type/Tax Classification:    S Corporation		State: CA
ZIP/Postal Code: 90069-2433		Country: US
Date Originally Established:	Current Ownership Since:	Number of Employees:    1
06/04/2012		Business Phone: 412/352-0363
Annual Gross Sales:    \$100,000.00	Year Sales Reported:    06/04/2012	Fiscal Year End:  
Primary Financial Institution:  	Number of Locations:    1	Cellular Phone:  
Primary State 1:  	Primary State 2:  	Primary State 3:  
Primary Country 1:  	Primary Country 2:  	Primary Country 3:  
e-Mail Address:  		Website:  
Sales Market:    LOCAL		
Industry:    Construction		
Description of Business:  		
Major Suppliers/Customers:  		

**Bank Use Only**

Name/Entity Verification:    Secretary of State		Address Verification:  	BACC Reference Number:    612BAC2852349
Document Filing Number/Description:    201201710043		Filing Country: US	Filing State: CA
Filing Date: 06/04/2012		Expiration Date:  	
Country of Registration:    US	State of Registration:    CA	International Transactions:  	
		Check Reporting:    NO RECORD	
Customer 1 Name:    SLAG CONST LLC		Internet Gambling Business?:    No	



Business Account Application

## Owner/Key Individual 1 Information

Customer Name: <input type="text" value="PEGAH SADRHASHEMINEJAD"/>			Residence Address: <input type="text" value="1134 ALTA LOMA RD APT 303"/>	
Position/Title: <input type="text" value="PARTNER"/>	Date of Birth: <input type="text" value="02/10/1979"/>	Enterprise Customer Number (ECN): <input type="text" value="228421802054710"/>	Address Line 2: <input type="text" value=""/>	
Taxpayer Identification Number (TIN): <input type="text" value="141-06-3068"/>			Address Line 3: <input type="text" value=""/>	
Primary ID Type: <input type="text" value="DLIC"/>	Primary ID Description: <input type="text" value="S-362-680-007-108"/>		City: <input type="text" value="WEST HOLLYWOOD"/>	State: <input type="text" value="CA"/>
Primary ID St/Ctry/Prov: <input type="text" value="MD"/>	Primary ID Issue Date: <input type="text" value="10/07/2010"/>	Primary ID Expiration Date: <input type="text" value="02/10/2016"/>	ZIP/Postal Code: <input type="text" value="90069-2433"/>	Country: <input type="text" value="US"/>
Secondary ID Type: <input type="text" value="OTHR CC"/>	Secondary ID Description: <input type="text" value="HSBC CC"/>		Check Reporting: <input type="text" value="NO RECORD"/>	
Secondary ID State/Country: <input type="text" value=""/>	Secondary ID Issue Date: <input type="text" value="01/01/2010"/>	Secondary ID Expiration Date: <input type="text" value="01/01/2014"/>		
Country of Citizenship: <input type="text" value="IR"/>	Permanently Resides in US: <input type="text" value="YES"/>			



**Certificate of Authority**

Each person who signs the "Certified/Agreed To" section of this Application certifies that:

- A. The Customer's use of any Bank deposit account, product or service will confirm the Customer's receipt of, and agreement to be bound by, the Bank's applicable fee and information schedule and account agreement that includes the Arbitration Agreement under which any dispute between the Customer and the Bank relating to the Customer's use of any Bank deposit account, product or service will be decided in an arbitration proceeding before a neutral arbitrator as described in the Arbitration Agreement and not by a jury or court trial.**
- B. Each person who signs the "Certified/Agreed To" section of this Application or whose name, any applicable title and specimen signature appear in the "Authorized Signers-Signature Capture" section of this Application is authorized on such terms as the Bank may require to:**
  - (1) Enter into, modify, terminate and otherwise in any manner act with respect to accounts at the Bank and agreements with the Bank or its affiliates for accounts and/or services offered by the Bank or its affiliates (other than letters of credit or loan agreements);
  - (2) Authorize (by signing or otherwise) the payment of items from the Customer's account(s) listed on this Business Account Application (including without limitation any item payable to (a) the individual order of the person who authorized the item or (b) the Bank or any other person for the benefit of the person who authorized the item) and the endorsement of Deposited Items for deposit, cashing or collection (see the Bank's applicable account agreement for the definitions of "item" and "Deposited Item");
  - (3) Give instructions to the Bank in writing (whether the instructions include the manual signature or a signature that purports to be the facsimile or other mechanical signature including a stamp of an Authorized Signer as the Customer's authorized signature without regard to when or by whom or by what means or in what ink color the signature may have been made or affixed), orally, by telephone or by any electronic means in regard to any item and the transaction of any business relating to the Customer's account(s), agreements or services, and the Customer shall indemnify and hold the Bank harmless for acting in accordance with such instructions; and
  - (4) Delegate the person's authority to another person(s) or revoke such delegation, in a separate signed writing delivered to the Bank.
- C. If a code must be communicated to the Bank in order to authorize an item, and the code is communicated, the item will be binding on the Customer regardless of who communicated the code.**
- D. Each transaction described in this Certificate of Authority conducted by or on behalf of the Customer prior to delivery of this Certificate is in all respects ratified.**
- E. If the Customer is a tribal government or tribal government agency, the Customer waives sovereign immunity from suit with respect to the Customer's use of any Bank account, product or service referred to in this Certificate.**
- F. The information provided in this Application is correct and complete, each person who signs the "Certified/Agreed To" section of this Application and each person whose name appears in the "Authorized Signers-Signature Capture" section of this Application holds any position indicated, and the signature appearing opposite the person's name is authentic.**
- G. The Customer has approved this Certificate of Authority or granted each person who signs the "Certified/Agreed To" section of this Application the authority to do so on the Customer's behalf by:**
  - (1) resolution, agreement or other legally sufficient action of the governing body of the Customer, if the Customer is not a trust or a sole proprietor;
  - (2) the signature of each of the Customer's trustee(s), if the Customer is a trust; or
  - (3) the signature of the Customer, if the Customer is a sole proprietor.

**Certified/Agreed To**

Owner/Key Individual 1 Name

PEGAH SADRHASHEMINEJAD

Position/Title:

PARTNER

Owner/Key Individual 1 Signature

Submit manually  
 Signature not required

Date:  
 12/14/2012



**Request for Taxpayer Identification Number and Certification**

(Substitute Form W-9)

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. UNLESS I HAVE CHECKED ONE OF THE BOXES BELOW, I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding (does not apply to real estate transactions, mortgage interest paid, the acquisition or abandonment of secured property, contributions to an Individual Retirement Arrangement (IRA), and payment other than interest and dividends).
3. I am a U.S. citizen or other U.S. person.  I am subject to backup withholding  I am exempt from backup withholding

**Note: The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.**

Tax Responsible Customer Name:

SLAG CONST LLC

Taxpayer Identification Number (TIN):

45-4292603

TIN Certification Signature:

Submit manually  
 Signature not required

Date:

**Authorized Signers - Signature Capture**

Authorized Signer 1 Name

PEGAH SADRHASHEMINEJAD

Position/Title:

PARTNER

Authorized Signer 1 Signature

Submit manually  
 Signature not required

Date:

12/14/2012



# Consumer Account Application


 WELLS  
FARGO

Bank Name:  
WELLS FARGO BANK, N.A.  
Banker Name:  
MARIE LOKMANYAN  
Banker Phone:  
310/657-3951

Store Name:  
CEDARS SINAI  
Officer/Portfolio Number:  
CN616  
Store Number:  
04498  
Banker AU:  
0000807  
Banker MAC:  
E2164-011

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## New Account Information

Product Name: PMA Premier Checking	Minor:	COID:	Product:	Account Number:
	114	CDA		15536451213

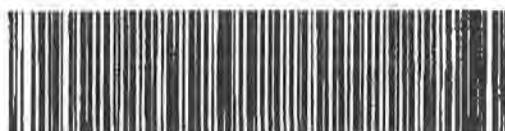
New Account Kit:  
Printed

## Related Customers

Customer Name: PEGAH SADRHASHEMINEJAD	Account Relationship: Sole Owner
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## Checking/Savings Statement Mailing Information

Customer(s) Listed on Statement: PEGAH SADRHASHEMINEJAD	Statement Mailing Address: 1134 ALTA LOMA RD APT 303	
	Address Line 2:	
	City: WEST HOLLYWOOD	State: CA
	ZIP/Postal Code: 90069-2433	Country: US



## Consumer Account Application

## Customer 1 Information

Customer Name: PEGAH SADRHASHEMINEJAD		Street Address: 1134 ALTA LOMA RD APT 303	
Account Relationship: Role Owner		Address Line 2:	
Taxpayer Identification Number (TIN): TIN Type: 41-06-3068 SSN		Date of Birth: 02/10/1979	
Primary ID Type: DTC	Primary ID Description: S-362-680-007-108	City: WEST HOLLYWOOD	State: CA
Primary ID St/City/Prov: MI	Primary ID Issue Date: 01/01/2010	Primary ID Expiration Date: 02/10/2016	ZIP/Postal Code: 90069-2433
Secondary ID Type: OTER CC	Secondary ID Description: HSBC CC	Country: US	
Secondary ID State/Country: MI	Secondary ID Issue Date: 01/01/2010	Secondary ID Expiration Date: 01/01/2014	Time at this address: 12 Year(s) 4 Month(s)
Home Phone: 427352-0363	Business Phone: 412/352-0363	Directional Address: (Document when no physical residence, business or alternate street address.)	
Current Employer: SLAG CONST. LLC	Previous Street Address:		
Check Reporting: NO RECORD	City: State:		
Country of Citizenship: IR	Permanently Resides In US: YES	ZIP/Postal Code:	Country: Time at this address: Year(s) Month(s)

## Request for Taxpayer Identification Number and Certification

(Substitute Form W-9)

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. UNLESS I HAVE CHECKED ONE OF THE BOXES BELOW, I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding (does not apply to real estate transactions, mortgage interest paid, the acquisition or abandonment of secured property, contributions to an Individual Retirement Arrangement (IRA), and payment other than interest and dividends).
3. I am a U.S. citizen or other U.S. person.

 I am subject to backup withholding I am exempt from backup withholding

Tax Responsible Customer Name:

PEGAH SADRHASHEMINEJAD

Taxpayer Identification Number (TIN):

141-06-3068

TIN Certification Signature


 Submit manually Signature not required

Date:

05/24/2012

## Customer Signatures

Everything I have stated in this application is correct. You are authorized to make any inquiries that you consider appropriate to determine if you should open or maintain the account. This may include ordering a credit report or other report (i.e. Information from any motor vehicle department or other state agency) on me. I have received a copy of the applicable account agreement, the privacy policy, and the Direct Deposit Advance Service Agreement and Product Guide\* (as each may be amended from time to time) and agree to be bound by their terms. I also agree to the terms of the dispute resolution program described in the foregoing agreements. Under the dispute resolution program, our disputes will be decided before one or more neutral persons in an arbitration proceeding and not by a jury trial or a trial before a judge.

\*The Direct Deposit Advance service is not currently available in all states.



Consumer Account Application

Customer 1 Name

PEGAH SAIRHASHEMINEJAD

Customer 1 Signature

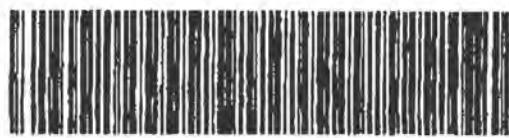


Submit manually

Signature not required

Date:

105/22/2012



2W02-000488530584-03

DSG8921 (5-12 SVP)

Page 3 of 3  
Wells Fargo Confidential

# Consumer Account Application

WELLS  
FARGO

Bank Name: WELLS FARGO BANK, N.A.	Store Name: BETHESDA NORTH		
Banker Name: TRENDY INGRAM	Officer/Portfolio Number: E3843	Date: 03/09/2012	
Banker Phone: 301/907-2030	Store Number: 08351	Banker AU: 0067111	Banker MAC: R1006-010

To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

## New Account Information

Product Name: PMA Premier Checking	Minor:	COID: 336	Product:	Account Number: 1891892364
New Account Kit: C20110404-0027587438				

## Related Customers

Customer Name: SHOKOUSH AZAM SHAFIEE AZAD	Account Relationship: Sole Owner
--	-------------------------------------

## Checking/Savings Statement Mailing Information

Customer(s) Listed on Statement: SHOKOUSH AZAM SHAFIEE AZAD	Statement Mailing Address: 7117 NATELLI WOODS LN	
	Address Line 2:	
	City: BETHESDA	State: MD
	ZIP/Postal Code: 20817-3927	Country: US



Consumer Account Application

**Customer 1 Information**

Customer Name: <b>SHOKOUSH AZAM SHAFIEE AZAD</b>		Street Address: <b>7117 NATELLI WOODS LN</b>				
Account Relationship: <b>Sole Owner</b>		Address Line 2:				
Taxpayer Identification Number (TIN): TIN Type: <b>1220-55-3780 SSN</b>		Date of Birth: <b>05/10/1958</b>		Address Line 3:		
Primary ID Type: <b>DLIC</b>	Primary ID Description: <b>S-123-765-079-356</b>			City: <b>BETHESDA</b>	State: <b>MD</b>	
Primary ID St/Ctry/Prov: <b>MD</b>	Primary ID Issue Date: <b>03/09/2012</b>	Primary ID Expiration Date: <b>05/10/2017</b>	ZIP/Postal Code: <b>20817-3927</b>	Country: <b>US</b>	Time at this address: <b>Year(s) Month(s)</b>	
Secondary ID Type: <b>OTHR DC</b>	Secondary ID Description: <b>WF VISA</b>	Directional Address: <i>(Document when no physical residence, business or alternate street address.)</i>				
Secondary ID State/Country:	Secondary ID Issue Date:	Secondary ID Expiration Date: <b>02/01/2015</b>				
Home Phone: <b>301/469-6245</b>	Business Phone:	Previous Street Address:				
Current Employer: <b>STUDENT</b>	City:				State:	
Check Reporting: <b>NO RECORD</b>	ZIP/Postal Code:	Country:	Time at this address: <b>Year(s) Month(s)</b>			
Country of Citizenship: <b>US</b>						

**Request for Taxpayer Identification Number and Certification**

(Substitute Form W-9)

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. UNLESS I HAVE CHECKED ONE OF THE BOXES BELOW, I am not subject to backup withholding either because I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or the IRS has notified me that I am no longer subject to backup withholding (does not apply to real estate transactions, mortgage interest paid, the acquisition or abandonment of secured property, contributions to an Individual Retirement Arrangement (IRA), and payment other than interest and dividends).

3. I am a U.S. person (including a U.S. resident alien).

 I am subject to backup withholding I am exempt from backup withholding

Tax Responsible Customer Name:

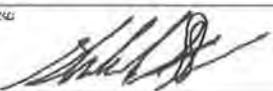
**SHOKOUSH AZAM SHAFIEE AZAD**

Taxpayer Identification Number (TIN):

**220-55-3780**

TIN Certification Signature

SHOKOUSH AZAM SHAFIEE AZAD


 Submit manually Signature not required

Date:

**03/09/2012****Customer Signatures**

Everything I have stated in this application is correct. You are authorized to make any inquiries that you consider appropriate to determine if you should open the account. This may include ordering a credit report or other report (i.e. information from any motor vehicle department or other state agency) on me. I have received a copy of the applicable account agreement and privacy brochure and agree to be bound by them, including the terms of the Direct Deposit Advance® service described in the Service Agreement and Product Guide and any amendment or addendum (Direct Deposit Advance service currently not available in all states). I also agree to the terms of the dispute resolution program described in the account agreement and the Direct Deposit Advance Service Agreement and Product Guide. Under this program our disputes will be decided before one or more neutral persons in an arbitration proceeding and not by a jury trial or a trial before a judge.



Consumer Account Application

Customer 1 Name

SHOKOUSHAZAM SHAFIEE AZAD

Customer 1 Signature

SHOKOUSHAZAM SHAFIEE AZAD



Submit manually

Signature not required

Date:

03/09/2012



DSG8921 (11-11 SVP)

2W02-000425827623-03

Page 3 of 3  
Wells Fargo Confidential

## Business Direct Credit Application

## Agreement &amp; Personal Guarantee

WELLS  
FARGO

Banker Name: NOONIK TARVERDIAN	Officer/Portfolio Number: C7627	Date: 10/01/2013
Banker Phone: 310/657-3951	Store Number: 22164	Banker AU: 0000807

**Business/Application Information**

Business Name: SAPENE LLC	Application ID: SVPP000004694760
Credit Application for: Wells Fargo Business Platinum card	Amount Requested: \$50,000

**Acknowledgment & Customer Signature:**

By signing below, I certify that I am an owner, partner, member, shareholder, director, and/or officer of the business named above ("Applicant"), I am authorized to submit this application on behalf of the "Applicant" and that all information and documents provided in connection with this application, including federal and state income tax returns (if any), are true, correct and complete. I further certify that this credit request is for my business only, and that all proceeds will be used solely for business or commercial purposes. I authorize Wells Fargo Bank, N.A. ("Bank") to obtain balance and payoff information and requires verification of payoff on all accounts requiring payoff as a condition of approving this application and to obtain at any time consumer and business reports from and to report credit information to others, including the Internal Revenue Service and state taxing authorities, about me and my business, both in connection with this application as well as any review, extension or renewal of the credit granted pursuant to this application. I also authorize Bank to use such information and to share with its affiliates in order to determine whether the business is qualified for other products and services offered by Bank and its affiliates. I agree to notify Bank promptly of any material change in such information. I acknowledge that (i) this application is subject to final approval of the Applicant and its owners, and that (ii) additional information (e.g., financial statements, tax returns and/or IRS Form 4506-T Request For Transcript of Tax Return) may be required in order for Bank to make a final credit decision. A facsimile of my signature, in any capacity, may be used as evidence of the Applicant's acceptance of these agreements. Note: Except in Arizona, if the business owner is married, a spouse's signature is not required unless he or she is the co-owner of the business. **If the Applicant is a legal entity, all owners listed on this application are asked to sign below and include their titles.**

**NON-PROFIT NOTICE AND DISCLAIMER:** Not-for-profit organizations are not eligible for the Secured BusinessLine line of credit. If the applicant is a not-for-profit organization recognized by and in good standing with the Internal Revenue Service, the personal guaranty of the signer is not required, and the personal guaranty paragraph below shall have no force or effect.

**For Wells Fargo BusinessLine, Wells Fargo Secured BusinessLine, Wells Fargo Equipment Express, Wells Fargo Business Platinum card, Wells Fargo Business Secured card, Wells Fargo Small Business Advantage Line of Credit and Wells Fargo BusinessLoan applicants:** By signing below, I agree on behalf of the Applicant to be bound by the terms of the Customer Agreement, Wells Fargo Business Lending Confirmation Letter (where applicable) and other written documentation that will be sent to Applicant and to pay Bank's costs and attorneys' fees in enforcing the Customer Agreement and other written documentation. I further agree that use of any feature of the BusinessLine line of credit, Equipment Express loan, Wells Fargo Business Platinum card, Wells Fargo Business Secured card, Wells Fargo Small Business Advantage line of credit or Wells Fargo BusinessLoan term loan may be used as evidence of the foregoing authorizations, acceptances, and agreements. For the Equipment Express loan, interest charges will start from the date we issue the check to fund the loan(s). For unsecured Wells Fargo Business Platinum card, Wells Fargo BusinessLine, Wells Fargo Equipment Express, Wells Fargo Small Business Advantage Line of Credit and Wells Fargo BusinessLoan, if approved, I agree to accept the actual credit amount granted which may be less than the preferred amount. If the actual credit granted is less than the preferred amount, individual credit lines will be reduced proportionately. For the Wells Fargo Secured BusinessLine and Wells Fargo Business Secured card, I acknowledge that it will be a condition for granting the credit facility that it be secured by an eligible CD/Savings account (Wells Fargo Secured BusinessLine) or deposit account (Wells Fargo Business Secured Card) maintained with Bank in an amount equal to or greater than the actual credit granted. For the Wells Fargo BusinessLoan term loan, I authorize Wells Fargo to distribute the loan proceeds electronically into credit and/or deposit accounts I designate, or to distribute the proceeds via check to the address listed herein. I acknowledge that the check will be valid for only 30 days after issuance, and agree that the Applicant will be held responsible for funds that are received, regardless of who deposits or negotiates the check.

By signing below, I also, **in my individual capacity** (even though I may place a title or other designation next to my signature), jointly and severally unconditionally guarantee and promise to pay to Bank all indebtedness of the Applicant at any time arising under or relating to any credit requested through this application, as well as any extensions, increases or renewals of that indebtedness. As guarantor, I waive (i) any requirement that Bank (A) proceed against Applicant or any other person; (B) marshal assets or proceed against or exhaust any security held from any Applicant or any other person; (C) give notice of the terms, time and place of any public or private sale or other disposition of personal property security held from any of the Applicants or any other person; (D) take any other action or pursue any other remedy in Bank's power; or (E) make any presentment, demand, protest, notice of protest, and notice of non-payment hereunder or in connection with any obligations or evidences of indebtedness held by Bank as security for or which constitute in whole or in part the Indebtedness guaranteed hereunder; (ii) any defense arising by reason of any defense of the Applicant or other guarantor; and (iii) the right to require Bank to proceed against the Applicant or any other guarantor, to pursue any remedy in connection with the guaranteed indebtedness, or to notify guarantor of any additional indebtedness incurred by the Applicant, or of any changes in the Applicant's financial condition. I also authorize Bank, without notice or prior consent, to (i) extend, modify, compromise, accelerate, renew, increase

## Manual Submission Instructions:

Fax all pages of the signed form to  
Business Direct at 1-866-814-7729.  
Scanner enabled store: should scan



2W02-000596865296-01

BBG5370 (2-13 SVP)

**Acknowledgment & Customer Signature (Continued):**

or otherwise change the terms of the guaranteed indebtedness; (ii) proceed against one or more guarantors without proceeding against the Applicant or another guarantor; and (iii) release or substitute any party to the indebtedness or this guaranty; and (iv) take and hold security for the payment of this Guaranty or the Indebtedness of Applicant or any portion thereof, and exchange, enforce, waive, subordinate or release any such security; (c) apply such security and direct the order or manner of sale thereof, including without limitation, a non-judicial sale permitted by the terms of the controlling security agreement, as Bank in its discretion may determine, and Guarantor hereby waives any provision of law regarding application of payments which specifies otherwise. I agree (i) I will pay Bank's costs and attorneys' fees in enforcing this guaranty (ii) this guaranty will be governed by South Dakota law; and (iii) this guaranty shall benefit Bank and its successors and assigns; and (iv) an electronic facsimile of my signature, in any capacity, may be used as evidence of my agreement to the terms of this guaranty.

**Optional Credit Protection Program:** This program will cancel debt on your *BusinessLine* and/or *Secured BusinessLine* if you are unable to work due to a major event as described in the Terms and Conditions for the Credit Protection program that will be provided to you. The debt cancellation will be a fixed benefit payment equal to 5% of the balance plus the Credit Protection service fee on the statement immediately following the covered event. It is not a waiver of any amounts due on your credit account(s). You agree to pay the monthly Credit Protection fees (\$0.35/\$100 of average daily balance) as charged based on the average daily balance for the Primary Account and all Linked accounts. If Credit Protection fees are not paid each month, fees will become part of the account balance and interest will accrue. In order to be eligible for debt cancellation, you must have met the eligibility requirements and be enrolled for 30 days before the benefit amount is requested and approved. Once you have enrolled, you will receive a complete Terms and Conditions for the Credit Protection Program. Please read it and keep for future reference.

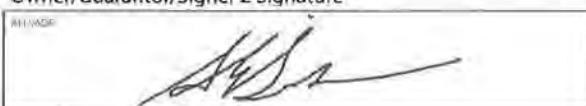
**Telephone Monitoring And Contacting You:** From time to time Bank may monitor and record telephone calls regarding your Account to assure the quality of our service. You agree, in order for Bank to service the Account or to collect any amounts you may owe, that we may from time to time make calls and send text messages to you, using prerecorded/artificial voice messages and/or through the use of an automatic dialing device, at any telephone number associated with your account, including mobile telephone numbers that could result in charges to you. You also expressly consent to Bank sending email messages regarding your Account to your email address.

**New Account Identification Requirements:** To help the government fight the funding of terrorism and money laundering activities, U.S. Federal law requires financial institutions to obtain, verify, and record information that identifies each person (individuals and businesses) who opens an account. What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

Owner/Guarantor/Signer 1 Name PEGAH SADR HASHEMINEJAD	Position/Title: partner	Customer Number (ECN): 228421802054710
--	----------------------------	---

Owner/Guarantor/Signer 1 Signature 	<input type="checkbox"/> Submit manually <input type="checkbox"/> Signature not required	Date: 10/01/2013
---	---	---------------------

Owner/Guarantor/Signer 2 Name ALI SADR	Position/Title: partner	Customer Number (ECN): 700499054641634
---	----------------------------	---

Owner/Guarantor/Signer 2 Signature 	<input type="checkbox"/> Submit manually <input type="checkbox"/> Signature not required	Date: 10/01/2013
--	---	---------------------

**Manual Submission Instructions:**

Fax all pages of the signed form to  
Business Direct at 1-866-814-7729.  
Scanner enabled store: should scan



2W02-000596865296-02



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From January 25, 2010 to February 25, 2010

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$0.00
Payments	-	\$0.00
Other Credits	-	\$775.40
Purchases/Debits	+	\$838.99
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
<b>Fees Charged</b>	+	<b>\$0.00</b>
<b>Interest Charged</b>	+	<b>\$0.00</b>
New Balance		\$63.59
Revolving Credit Limit		\$10,000.00
Revolving Credit Available		\$9,936.41
Statement Closing Date		February 25, 2010
Days in Billing Cycle		31

Payment Information		
New Balance		\$63.59
Minimum Payment Due		\$15.00
Payment Due Date		March 22, 2010
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	5 Months	\$65

If you would like information about credit counseling services call in 1-866-569-2227.

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

**Transactions**

Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount	
01/26/10	02/03/10	RETAIL CREDIT ADJUSTMENT	0589-03FEB10 (01-01)000	-\$160.00	
01/26/10	02/03/10	RETAIL CREDIT ADJUSTMENT	0590-03FEB10 (01-01)000	-\$615.40	
<b>Total Payment For This Period</b>				\$-775.40	
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
01/26/10	01/29/10	REVOLVE CLOTHING.COM LA MIRADA CA		MT100280103000010200272	\$160.00
01/26/10	01/29/10	UNITED SAN ANTONIO TX NAME: SADR/NEGARIN CTY OF ORGN: ROC TRVL DT: 020510 CTY DEST: IAD SVC PRVDR: UA FARE TYPE: E STOPOVER: O		MT100280105000010206136	
<b>Transaction Total</b>				\$615.40	
02/18/10	02/20/10	TALBERT'S ICE & BEVERA BETHESDA MD		MT100510104000010219616	\$63.59
<b>Total Purchases For This Period</b>				\$838.99	

Detach and return bottom portion with your payment.

140850 5 27 0000000411 G STMTL1 D 6 4990 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$63.59  
Minimum Payment Due \$15.00  
Payment Due Date 03/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



5451984664282280000150000063592

GOVERNMENT  
EXHIBIT  
495A  
18 Cr. 224 (AJN)



HSBC PREMIER WORLD MASTERCARD


 HSBC Premier World MasterCard Account Statement  
 Account Number 5451-9846-6428-2280  
 From January 25, 2010 to February 25, 2010

Page 2 of 2

Fees		Reference Number	Amount
Trans Date	Post Date	Description of Fees	
<b>Interest Charged</b>			
<b>Description of Interest Charge</b>			
		INTEREST CHARGE ON CASH ADVANCES	\$0.00
		INTEREST CHARGE ON PURCHASES	\$0.00
		INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
		<b>Total Interest For This Period</b>	<b>\$0.00</b>
<b>2010 Totals Year to Date</b>			
		Total fees charged in 2010	\$0.00
		Total interest charged in 2010	\$0.00

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	4,324		
Points	839		
Bonus Points	839		
Total Points	6,202		

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	

140850 5 27 0000000411 0 STMTL1 D 6 4990 PMEI



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From February 25, 2010 to March 26, 2010

Page 1 of 2

Summary of Account Activity		Payment Information
Previous Balance	\$63.59	\$181.99
Payments	-\$850.36	\$15.00
Other Credits	\$0.00	April 22, 2010
Purchases/Debits	+\$968.76	
Balance Transfers	\$0.00	
Cash Advances	\$0.00	
Past Due Amount	\$0.00	
<b>Fees Charged</b>	<b>\$0.00</b>	
<b>Interest Charged</b>	<b>\$0.00</b>	
New Balance	\$181.99	
Revolving Credit Limit	\$10,000.00	
Revolving Credit Available	\$9,818.01	
Statement Closing Date	March 26, 2010	
Days in Billing Cycle	29	

If you would like information about credit counseling services call in 1-866-569-2227.

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount	
03/09/10	03/10/10	PAYMENT - THANK YOU	6545198006801NLDK57WKJG	-\$850.36	
<b>Total Payment For This Period</b>				-\$850.36	
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
03/01/10	03/02/10	Fraud Balance Transfer	3168-02MAR10 (01-01)000		\$775.40
03/01/10	03/03/10	MADISON DELI MCLEAN VA	MT100620104000010206758		\$6.70
03/03/10	03/05/10	DC PARKING METERS WASHINGTON DC	MT100640105000010193060		\$1.92
03/03/10	03/05/10	DC PARKING METERS WASHINGTON DC	MT100640105000010193064		\$2.75
03/11/10	03/12/10	AMOOS HOUSE OF KABOB MCLEAN VA	MT100710104000010213735		\$98.00
03/11/10	03/13/10	TECHARMOUR MCCLAIN VA	MT100720103000010213438		\$83.99
<b>Total Purchases For This Period</b>				\$968.76	
Fees					
Trans Date	Post Date	Description of Fees	Reference Number	Amount	

Detach and return bottom portion with your payment.

1408503 27 0000000411 G STMTHI D 6 19683 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$181.99  
Minimum Payment Due \$15.00  
Payment Due Date 04/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



54519846642822800001500000181998



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From February 25, 2010 to March 26, 2010

Page 2 of 2

Interest Charged		Amount
Description of Interest Charge		
INTEREST CHARGE ON CASH ADVANCES		\$0.00
INTEREST CHARGE ON PURCHASES		\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
<b>Total Interest For This Period</b>		<b>\$0.00</b>
2010 Totals Year to Date		
Total fees charged in 2010		\$0.00
Total interest charged in 2010		\$0.00

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	6,202		
Points	34		
Bonus Points	34		
Total Points	6,270		
		Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.	

Customer News			
Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges program! Simply visit <a href="http://www.privileges.hsbcpremier.com">www.privileges.hsbcpremier.com</a> to find out more.			

140850 5 27 0000000411 G STMTII D 6 19683 PMBI



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 26, 2010 to April 27, 2010

Page 1 of 3

Summary of Account Activity	
Previous Balance	\$181.99
Payments	\$3,440.13
Other Credits	\$0.00
Purchases/Debits	\$6,826.20
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$0.00</b>
<b>Interest Charged</b>	<b>\$0.00</b>
<b>New Balance</b>	<b>\$3,568.06</b>
Revolving Credit Limit	\$10,000.00
Revolving Credit Available	\$6,431.94
Statement Closing Date	April 27, 2010
Days in Billing Cycle	32

## Payment Information

New Balance	\$3,568.06
Minimum Payment Due	\$36.00
Payment Due Date	May 22, 2010

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.

**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	18 Years	\$6,139
\$115	3 Years	\$4,144 (Savings = \$1,995)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

## Transactions

## Payments/Returns/Credits

Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount
04/19/10	04/19/10	PAYMENT - THANK YOU	6545198010901KK2XZGN985	-\$3,440.13
<b>Total Payment For This Period</b>				<b>-\$3,440.13</b>

## Purchases/Debits

Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
04/04/10	04/06/10	MADINAT JUM - F&B DUBAI UAE		MT100960105000010216811	\$98.57
	04/04/10	362.00 AED			
04/06/10	04/07/10	COSTA DUBAI UAE		MT100970108000010163207	\$7.62
	04/06/10	28.00 AED			
04/07/10	04/08/10	COSTA DUBAI UAE		MT100980101000010211895	\$7.62
	04/07/10	28.00 AED			
04/07/10	04/09/10	EMIRATES DUBAI ARE		MT100990101000010069755	
		NAME: SADR HASHEMINEJAD/SEY			
		CTY OF ORGN: DXB TRVL DT: 041011			
		CTY DEST: GRU SVC PRVDR: EK			

Detach and return bottom portion with your payment.

140830 5 27 0000000411 C STMTII D 6 5656 PME1

See reverse side for Important Information



Account Number: 5451-9846-6428-2280  
New Balance \$3,568.06  
Minimum Payment Due \$36.00  
Payment Due Date 05/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



545198466428228000003600003568064



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 26, 2010 to April 27, 2010

Page 2 of 3

FARE TYPE: Y STOPOVER:					
<b>Transaction Total</b>					\$1,863.65
04/07/10 6845.00 AED					
NAME: SADR HASHEMINEJAD/SEY					
CTY OF ORGN: DXB TRL DT: 041011					
CTY DEST: GRU SVC PRVDR: EK					
FARE TYPE: Y STOPOVER:					
<b>Transaction Total</b>					\$0.00
04/09/10	04/10/10	THRIFTY CAR RENTAL	DUBAI	UAE	MT10100010000010230725
04/09/10 341.32 AED					\$92.95
04/06/10	04/12/10	WWW.SKYPE.COM	INTERNET	LUX	MT101020099000010225536
04/10/10	04/12/10	TAM	03054775997	TX	MT101020098000010775928
NAME: SADR HASHEMI NEJAD/S					
CTY OF ORGN: GRU TRL DT: 041510					
CTY DEST: CCS SVC PRVDR: JJ					
FARE TYPE: H STOPOVER:					
<b>Transaction Total</b>					\$512.00
04/12/10	04/13/10	93 V V SPP	SAO PAULO	BRA	MT101030107000010181151
04/12/10 1038.00 BRL					\$588.37
04/14/10	04/15/10	GALETOS-WIR LJ 07	SAO PAULO	BRA	MT101050107000010160059
04/14/10 129.58 BRL					\$74.41
04/22/10	04/22/10	HOTELS.COM US	800-219-4606	WA	MT101120109000010152249
04/21/10	04/23/10	PROGRESSIVE INS	800-888-7764	OH	MT10113010300010226070
04/22/10	04/24/10	LIAT 1974 LIMITED	Without Addre	ATG	MT101140099000010228702
04/24/10	04/26/10	HOTELS.COM US	800-219-4606	WA	MT101160101000010789866
04/24/10	04/26/10	HOTELS COM US	800-219-4606	WA	MT101160101000010789868
04/24/10	04/26/10	BWIA	INTERNET	NY	MT101160101000010820359
NAME: S. SADR HASHEMI					
CTY OF ORGN: CCS TRL DT: 042210					
CTY DEST: POS SVC PRVDR: BW					
FARE TYPE: Y STOPOVER:					
<b>Transaction Total</b>					\$482.10
04/24/10	04/26/10	CARIBBEAN DESINGS INC	ST KITTS	KNA	MT101160104000010241362
04/24/10	04/26/10	DUTY FREE PLAZA	BASSETERRE	KNA	MT101160104000010241364
04/21/10	04/27/10	WWW.SKYPE.COM	INTERNET	LUX	MT101170102000010221373
04/22/10	04/27/10	ALLIED HOTELS LTD	PORT OF SPAIN	TTO	MT101170100000010207132
04/23/10	04/27/10	LIAT 1974 LIMITED	Without Addre	ATG	MT101170102000010224353
04/24/10	04/27/10	MIDEASTA 0767884750	Beirut	NY	MT101170101000010098698
NAME: SADR HASHEMI NEJAD/S					
CTY OF ORGN: LHR TRL DT: 042910					
CTY DEST: BEY SVC PRVDR: ME					

140830 5 27 0000000411 G STMT11 D 6 3636 PME1



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 26, 2010 to April 27, 2010

Page 3 of 3

FARE TYPE: K STOPOVER:			
Transaction Total			\$839.50
Total Purchases For This Period			\$6,826.20
Trans Date	Post Date	Description of Fees	Fees
			Interest Charged
			Description of Interest Charge
			INTEREST CHARGE ON CASH ADVANCES \$0.00
			INTEREST CHARGE ON PURCHASES \$0.00
			INTEREST CHARGE ON BALANCE TRANSFERS \$0.00
			Total Interest For This Period \$0.00
			2010 Totals Year to Date
			Total fees charged in 2010 \$0.00
			Total interest charged in 2010 \$0.00

Interest Charge Calculation			
Your Annual Percentage Rate (APR) is the annual interest rate on your account.			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00
v=Variable Rate			

HSBC PREMIER REWARDS Summary			
Previous Points	6,270	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.	
Points	6,827		
Bonus Points	6,827		
Total Points	19,924		

Customer News	
Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges programme! Simply visit <a href="http://www.privileges.hsbcpremier.com">www.privileges.hsbcpremier.com</a> to find out more.	



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2010 to May 28, 2010

Page 1 of 4

Summary of Account Activity		
Previous Balance		\$3,568.06
Payments	-	\$4,590.85
Other Credits	-	\$1,110.31
Purchases/Debits	+	\$8,521.97
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$0.00
<b>Fees Charged</b>	+	<b>\$0.00</b>
<b>Interest Charged</b>	+	<b>\$0.00</b>
New Balance		\$6,388.87
Revolving Credit Limit		\$10,000.00
Revolving Credit Available		\$3,611.13
Statement Closing Date		May 28, 2010
Days in Billing Cycle		31

Payment Information		
New Balance		\$6,388.87
Minimum Payment Due		\$64.00
Payment Due Date		June 22, 2010
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	23 Years	\$11,308
\$206	3 Years	\$7,420 ( <i>Savings = \$3,888</i> )

If you would like information about credit counseling services call 1-866-569-2227.

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

**Transactions**

Payments/Returns/Credits							
Trans Date	Post Date	Description of Transaction or Credit			Reference Number	Amount	
05/01/10	05/01/10	PAYMENT - THANK YOU			65451980121013JCZP1XV59	-\$4,590.85	
05/03/10	05/03/10	HOTELS.COM US 800-219-4606 WA			MT101230107000010130935	-\$320.81	
05/13/10	05/14/10	MIDEASTA 0767884750 Beirut NY			MT101340103000010072939	-\$789.50	
<b>Total Payment For This Period</b>						<b>-\$5,701.16</b>	
Purchases/Debits							
Trans Date	Post Date	Description of Transaction or Credit			Purchase Type	Reference Number	Amount
04/23/10	04/28/10	PIZZA BOYS - DELI PIARCO TTO				MT101180100000010228625	\$5.69
		04/23/10 36.00 TTD					
04/28/10	04/28/10	HOTELS.COM US 800-219-4606 WA				MT101180108000010158751	\$173.34
04/24/10	04/29/10	MARRIOTT ST KITTS KNA				MT101190101000010073322	
		MRCH INV#: 000005451					
		ARRVL DT: 042410 DPRT DT: 042410					
		MRCH PH: 8694661200					
		PROPERTY PH: 8694661200					
<b>Transaction Total</b>						<b>\$15.50</b>	

Detach and return bottom portion with your payment.

140830 3 27 0000000411 G STMTHI D 6 11639 PME1

See reverse side for important information

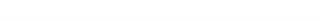


Account Number: 5451-9846-6428-2280  
New Balance \$6,388.87  
Minimum Payment Due \$64.00  
Payment Due Date 06/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332





## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2010 to May 28, 2010

Page 2 of 4

04/24/10	04/29/10	MARRIOTT	ST KITTS	KNA	MT101190101000010073323	
		MRCH INV#:	000005451			
		ARRVL DT:	042410	DPRT DT:	042410	
		MRCH PH:	8694661200			
		PROPERTY PH:	8694661200			
		<b>Transaction Total</b>				\$6.00
04/25/10	04/29/10	MARRIOTT	ST KITTS	KNA	MT101190101000010073321	
		MRCH INV#:	000005451			
		ARRVL DT:	042510	DPRT DT:	042510	
		MRCH PH:	8694661200			
		PROPERTY PH:	8694661200			
		<b>Transaction Total</b>				\$26.50
04/27/10	04/29/10	MIDEASTA	0767885370	Beirut	NY	MT101190101000010071741
		NAME:	SADR HASHEMI NEJAD/S			
		CTY OF ORGN:	LHR	TRVL DT:	042910	
		CTY DEST:	BEY	SVC PRVDR:	ME	
		FARE TYPE:	Q	STOPOVER:		
		<b>Transaction Total</b>				\$593.50
04/29/10	04/30/10	The Season's	Geneve	15	CHE	MT101200102000010073140
		04/29/10	129.00	CHF		\$118.89
04/29/10	04/30/10	Gros Porteur	CHGD	Geneve	CHE	MT101200102000010073143
04/29/10	05/01/10	MARRIOTT	ST.KITTS	KNA	MT101210100000010076130	
		MRCH INV#:	000005451			
		ARRVL DT:	042510	DPRT DT:	042910	
		MRCH PH:	8694661200			
		PROPERTY PH:	8694661200			
		<b>Transaction Total</b>				\$358.80
04/27/10	05/03/10	WWW.SKYPE.COM	LUX	INTERNET	MT101230100000010175172	\$10.00
04/27/10	05/03/10	WWW.SKYPE.COM	LUX	INTERNET	MT101230100000010175173	\$10.00
05/02/10	05/03/10	HOTELS.COM US	800-219-4606	WA	MT101230099000010773289	\$145.31
05/02/10	05/03/10	HOTELS.COM US	800-219-4606	WA	MT101230099000010773290	\$1,769.08
05/02/10	05/03/10	HOTELS.COM US	800-219-4606	WA	MT101230099000010773292	\$554.75
05/03/10	05/04/10	THE COPTHORNE TARA	LONDON	GBR	MT101240102000010231948	\$22.83
		05/03/10	15,00	GBP		
05/06/10	05/06/10	HOTELS.COM US	800-219-4606	WA	MT101260108000010170403	\$170.16
05/05/10	05/07/10	Hôtel de la Paix	Genève	CHE	MT101270102000010063450	\$3,697.33
		05/05/10	4102.00	CHF		
05/03/10	05/10/10	WWW.SKYPE.COM	LUX	INTERNET	MT101300100000010892747	\$12.95
04/23/10	05/11/10	ROYAL CASTLE LI	PIARCO	TTO	MT101310101000010251814	\$4.69
		04/23/10	29.50	TTD		
05/14/10	05/17/10	BETTER LIFE	DUBAI	UAE	MT101370098000010831792	\$135.86
		05/14/10	499.00	AED		

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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2010 to May 28, 2010

Page 3 of 4

05/15/10	05/17/10	RIMAL SALOON DUBAI UAE	MT101370098000010831812	\$20.42
		05/15/10 75.00 AED		
05/15/10	05/17/10	MASSIMO DUTTI-FAZA TRA DUBAI UAE	MT101370101000010247246	\$51.46
		05/15/10 189.00 AED		
05/19/10	05/20/10	SANAM R.A.C - RTA FINE DUBAI ARE	MT101400103000010216582	\$50.38
		05/19/10 185.00 AED		
05/19/10	05/20/10	SANAM RENT A CAR DUBAI ARE	MT101400103000010216583	\$350.74
		05/19/10 1288.00 AED		
05/19/10	05/20/10	DRIFTWOOD BASSETERRE KNA	MT101400103000010220478	\$34.76
		05/19/10 93.45 XCD		
05/20/10	05/21/10	HALCYON COVE HOTEL ANTIGUA ATG	MT101410110000010167808	
		MRCH INV#: 000005451		
		ARRVL DT: 052010 DPRT DT: 052010		
		MRCH PH: 8094620271		
		PROPERTY PH: 8094620271		
		<b>Transaction Total</b>		\$49.29
		05/20/10 132.50 XCD		
		MRCH INV#: 000005451		
		ARRVL DT: 052010 DPRT DT: 052010		
		MRCH PH: 8094620271		
		PROPERTY PH: 8094620271		
		<b>Transaction Total</b>		\$0.00
05/27/10	05/28/10	SANAM R.A.C - RTA FINE DUBAI ARE	MT101480103000010240727	\$50.37
		05/27/10 185.00 AED		
		<b>Total Purchases For This Period</b>		\$8,521.97
		<b>Fees</b>		
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>	<b>Reference Number</b>	<b>Amount</b>
		<b>Interest Charged</b>		
		<b>Description of Interest Charge</b>		<b>Amount</b>
		INTEREST CHARGE ON CASH ADVANCES		\$0.00
		INTEREST CHARGE ON PURCHASES		\$0.00
		INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
		<b>Total Interest For This Period</b>		\$0.00
		<b>2010 Totals Year to Date</b>		
		Total fees charged in 2010	\$0.00	
		Total interest charged in 2010	\$0.00	

## Interest Charge Calculation

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

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HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2010 to May 28, 2010

Page 4 of 4

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	19,924	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or spending restrictions.
Points	7,411	
Bonus Points	7,411	
Total Points	34,746	

## Customer News

Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges programme! Simply visit [www.privileges.hsbcpremier.com](http://www.privileges.hsbcpremier.com) to find out more.

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HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From May 28, 2010 to June 27, 2010

Page 1 of 2

Summary of Account Activity		
Previous Balance		\$6,388.87
Payments	-	\$0.00
Other Credits	-	\$0.00
Purchases/Debits	+	\$2,379.29
Balance Transfers	+	\$0.00
Cash Advances	+	\$0.00
Past Due Amount		\$64.00
<b>Fees Charged</b>	+	<b>\$35.00</b>
<b>Interest Charged</b>	+	<b>\$66.46</b>
New Balance		\$8,869.62
Revolving Credit Limit		\$10,000.00
Revolving Credit Available		\$1,130.38
Statement Closing Date		June 27, 2010
Days in Billing Cycle		30

Payment Information		
New Balance		\$8,869.62
Minimum Payment Due		\$255.00
Payment Due Date		July 22, 2010
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	26 Years	\$15,716
\$286	3 Years	\$10,301 (Savings = \$5,415)

If you would like information about credit counseling services call  
1-866-569-2227.**Questions?**

24-Hour Customer Service 1-888-662-4722  
 Lost or Stolen Card 1-800-327-4214  
 Outside USA Collect 1-716-841-6866  
 TDD/Hearing Impaired 1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD  
21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA  
93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE CALL 800-724-4967 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

Transactions						
Purchases/Debits						
Trans Date	Post Date	Description of Transaction or Credit		Purchase Type	Reference Number	Amount
05/29/10	05/31/10	SANAM RENT A CAR	DUBAI	ARE	MT10151010000010249221	\$272.27
		05/29/10	1000.00 AED			
05/29/10	05/31/10	SANAM RENT A CAR	DUBAI	ARE	MT10151010000010249222	\$128.49
		05/29/10	471.92 AED			
06/05/10	06/07/10	TAM	03054775997 GA		MT101580101000010854408	
		NAME: SADR HASHEMINEJAD/SEY				
		CTY OF ORGN: CCS	TRVL DT: 060610			
		CTY DEST: GRU	SVC PRVDR: JJ			
		FARE TYPE: E	STOPOVER: O			
		<b>Transaction Total</b>				\$1,120.50
06/06/10	06/07/10	SANAM R A C SALIK	DUBAI	ARE	MT101580103000010252949	\$138.86
		06/06/10	510.00 AED			
06/03/10	06/09/10	WWW.SKYPE.COM	INTERNET		MT101600102000010243624	\$12.95
		LUX				

Detach and return bottom portion with your payment.

140830 5 27 0000000411 G STMII D 6 5904 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$8,869.62  
 Minimum Payment Due \$255.00  
 Payment Due Date 07/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140  
AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 3451-9846-6428-2280  
From May 28, 2010 to June 27, 2010

Page 2 of 2

06/15/10	06/16/10	ERMENEGILDO ZEGNA BRA	SAO PAULO	MT101670103000010230399	\$657.89
		06/15/10	1185.00 BRL		
06/22/10	06/24/10	HILTON CURACAO-FRNT DS WILLEMSTAD ANT		MT101750102000010225871	\$48.33
<b>Total Purchases For This Period</b>					<b>\$2,379.29</b>
<b>Fees</b>					
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>		<b>Reference Number</b>	<b>Amount</b>
06/22/10	06/22/10	LATE CHARGE ASSESSMENT		1000000411000099647120	\$35.00
<b>Total Fees For This Period</b>					<b>\$35.00</b>
<b>Interest Charged</b>					
<b>Description of Interest Charge</b>					<b>Amount</b>
INTEREST CHARGE ON CASH ADVANCES					\$0.00
INTEREST CHARGE ON PURCHASES					\$66.46
INTEREST CHARGE ON BALANCE TRANSFERS					\$0.00
<b>Total Interest For This Period</b>					<b>\$66.46</b>
<b>2010 Totals Year to Date</b>					
Total fees charged in 2010					\$35.00
Total interest charged in 2010					\$66.46

**Interest Charge Calculation**Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$8,093.47	\$66.46
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	34,746
Points	2,539
Bonus Points	2,539
Total Points	39,824

Get something special for someone special. Use your Rewards Points toward a gift card. Call 1-888-662-(HSBC) 4722 for details.

**Customer News**Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges program! Simply visit [www.privileges.hsbcpremier.com](http://www.privileges.hsbcpremier.com) to find out more.



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From June 27, 2010 to July 28, 2010

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$8,869.62
Payments	-\$16,108.66
Other Credits	\$0.00
Purchases/Debits	+\$11,004.36
Balance Transfers	\$0.00
Cash Advances	\$8.08
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$5.00</b>
<b>Interest Charged</b>	<b>\$0.09</b>
New Balance	\$3,770.41
Revolving Credit Limit	\$10,000.00
Revolving Credit Available	\$6,229.59
Statement Closing Date	July 28, 2010
Days in Billing Cycle	31

## Payment Information

New Balance \$3,770.41  
Minimum Payment Due \$38.00  
Payment Due Date August 22, 2010

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.

**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	19 Years	\$6,510
\$122	3 Years	\$4,379 ( <i>Savings</i> = \$2,131)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service 1-888-662-4722  
Lost or Stolen Card 1-800-327-4214  
Outside USA Collect 1-716-841-6866  
TDD/Hearing Impaired 1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
07/11/10	07/12/10	PAYMENT - THANK YOU		65451980192017V7HQS9HVD	-\$8,882.57
07/26/10	07/26/10	PAYMENT - THANK YOU		65451980207013Q3QBRWJZY	-\$1,226.09
<b>Total Payment For This Period</b>					<b>-\$16,108.66</b>
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
07/03/10	07/09/10	WWW.SKYPE.COM INTERNET LUX		MT101900102000010090886	\$12.95
07/14/10	07/15/10	TRAVELEX & CO. LLC MUSCAT MCT		MT101960102000010071740	\$8.08
	07/22/10	450.00 TRY			
07/22/10	07/23/10	CESME DALYAN KORFEZ RE IZMIR TUR		MT102040103000010086069	\$296.01
07/22/10	07/23/10	TUVAL SANAT GALERISI IZMIR TUR		MT102040103000010086074	\$402.58
07/22/10	07/23/10	MP/CESME ECZANESİ IZMIR TUR		MT102040104000010236200	\$14.14
	07/22/10	20.28 TRY			

Detach and return bottom portion with your payment.

140830 J 27 000000411 G STMTII D 6 6040 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$3,770.41  
Minimum Payment Due \$38.00  
Payment Due Date 08/22/2010

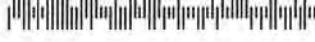
Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



5451984664282280000380003770419



## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From June 27, 2010 to July 28, 2010

Page 2 of 2

07/22/10	07/24/10	IZMIR CESME MARINA-CAR IZMIR TUR	MT102050101000010083546	\$13.36
07/22/10	07/24/10	IZMIR CESME MARINA-CAR IZMIR TUR	MT102050101000010083547	\$467.81
07/23/10	07/24/10	TAKSIM OTELCILIK - RAD IZMIR TUR	MT102050101000010083556	\$6,019.11
	07/25/10	487.50 TRY		
07/25/10	07/26/10	MARINA YACHT CLUB MUGLA TUR	MT102070104000010259114	\$322.46
07/27/10	07/28/10	MARINA YACHT CLUB MUGLA TUR	MT102090103000010223872	\$106.77
07/27/10	07/28/10	KEMPINSKI AYSIR TURZ.A MUGLA TUR	MT102090103000010223875	\$3,341.09
<b>Total Purchases For This Period</b>				<b>\$11,004.36</b>
<b>Fees</b>				
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>	<b>Reference Number</b>	<b>Amount</b>
07/15/10	07/15/10	CASH FEE FINANCE CHARGE	10000004110000999624150	\$5.00
<b>Total Fees For This Period</b>				<b>\$5.00</b>
<b>Interest Charged</b>				
<b>Description of Interest Charge</b>				<b>Amount</b>
INTEREST CHARGE ON CASH ADVANCES				\$0.09
INTEREST CHARGE ON PURCHASES				\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
<b>Total Interest For This Period</b>				<b>\$0.09</b>
<b>2010 Totals Year to Date</b>				
Total fees charged in 2010				<b>\$40.00</b>
Total interest charged in 2010				<b>\$66.55</b>

<b>Interest Charge Calculation</b>			
Your <b>Annual Percentage Rate (APR)</b> is the annual interest rate on your account.			
<b>Type of Balance</b>	<b>Annual Percentage Rate (APR)</b>	<b>Balance Subject to Interest Rate</b>	<b>Interest Charge</b>
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$4.93	\$0.09
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00
v=Variable Rate			

<b>HSBC PREMIER REWARDS Summary</b>			
Previous Points	39,824	Points	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Bonus Points	10,996		
Total Points	61,816		

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## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From July 28, 2010 to August 27, 2010

Page 1 of 3

Summary of Account Activity	
Previous Balance	\$3,770.41
Payments	+\$7,170.41
Other Credits	-\$0.00
Purchases/Debits	+\$8,693.57
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	+\$0.00
<b>Fees Charged</b>	<b>+\$0.00</b>
<b>Interest Charged</b>	<b>+\$0.00</b>
New Balance	\$5,293.57
Revolving Credit Limit	\$10,000.00
Revolving Credit Available	\$4,706.43
Statement Closing Date	August 27, 2010
Days in Billing Cycle	30

## Payment Information

New Balance \$5,293.57  
Minimum Payment Due \$53.00  
Payment Due Date September 22, 2010

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.

**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about..	And you will end up paying an estimated total of..
Only the minimum Payment	22 Years	\$9,301
\$171	3 Years	\$6,148 (Savings = \$3,153)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service 1-888-662-4722  
Lost or Stolen Card 1-800-327-4214  
Outside USA Collect 1-716-841-6866  
TDD/Hearing Impaired 1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297 -1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912 -0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions		Payments/Retuns/Credits			
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
07/30/10	07/30/10	PAYMENT - THANK YOU		6545198021101RL9PY59SBZ	-\$3,770.41
07/30/10	07/31/10	PAYMENT THANK YOU		45451980211014126210693	-\$3,400.00
<b>Total Payment For This Period</b>					
Transactions		Purchases/Debits			
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
	07/29/10	3888 30 TRY			
07/29/10	07/30/10	FERI OTELCLIK VE TURI ISTANBUL TUR		MT10211010300010083694	\$2,586.85
07/29/10	07/30/10	THY - WWW.THY.COM ISTANBUL TUR		MT10211010300010084703	\$734.88
07/29/10	07/30/10	THY-DIS HAT SATIS OFIS ISTANBUL TUR		MT10211010300010084706	\$130.40
07/30/10	08/02/10	HOTEL GALLES MILANO ITA		MT10214010200010831119	\$149.51
	07/30/10	84.00 CHF			
07/30/10	08/03/10	Cafe Rest Tououne ANDERMATT CHE		MT10215010300010238660	\$80.87

Detach and return bottom portion with your payment.

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See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$5,293.57  
Minimum Payment Due \$53.00  
Payment Due Date 09/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From July 28, 2010 to August 27, 2010

Page 2 of 3

07/31/10	08/03/10	Hotel Hoesli	ALTDORF UR	CHE	MT102150103000010238666	\$163.66
07/31/10	08/03/10	The River House	ANDERMATT	CHE	MT102150103000010238674	\$413.84
08/01/10	08/03/10	Hotel Allegra	Kloten	CHE	MT102150104000010085021	\$120.34
07/31/10	08/05/10	SWISS AIR	SAN ANTONIO	NY	MT102170104000010229392	
		NAME: SADR HASHEMI/ALI				
		CTY OF ORGN: ZRH	TRVL DT:	080110		
		CTY DEST: DXB	SVC PRVDR:	LX		
		FARE TYPE: STOPOVER:				
		<b>Transaction Total</b>				\$1,883.90
08/04/10	08/05/10	PFENDT AIRPORT OPTIC	FRANKFURT		MT102170110000010175862	\$221.99
		DEU				
08/03/10	08/09/10	SKYPE	44870835190	GBR	MT102210101000010899197	\$12.95
08/15/10	08/16/10	PROGRESSIVE INS	800-888-7764	OH	MT102280102000010265472	\$1,198.00
		08/19/10	45 00	TRY		
08/19/10	08/20/10	D\$DEM COLOR	KADIK#Y/\$STAN		MT102320104000010260429	\$30.18
		TUR				
		08/20/10	1250.00	TRY		
08/20/10	08/23/10	IZGE TURIZM ORG.	ISTANBUL	TUR	MT102350100000010839097	\$829.57
		08/24/10	95 00	TRY		
08/24/10	08/25/10	DOIU@ CENTER	KADIK#Y/\$STAN		MT102370103000010253445	\$62.87
08/24/10	08/25/10	DOIU@ CENTER	KADIK#Y/\$STAN		MT102370103000010253446	\$62.87
		08/24/10	16.61	TRY		
08/24/10	08/26/10	A.T.U TURIZM/GIRIS A3	ISTANBUL	TUR	MT102380102000010064501	\$10.89
		<b>Total Purchases For This Period</b>				\$8,693.57
		<b>Fees</b>				
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>		<b>Reference Number</b>		<b>Amount</b>
		<b>Interest Charged</b>				
		<b>Description of Interest Charge</b>				<b>Amount</b>
		INTEREST CHARGE ON CASH ADVANCES				\$0.00
		INTEREST CHARGE ON PURCHASES				\$0.00
		INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
		<b>Total Interest For This Period</b>				\$0.00
		<b>2010 Totals Year to Date</b>				
		Total fees charged in 2010			\$40.00	
		Total interest charged in 2010			\$66.55	

**Interest Charge Calculation**

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

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## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From July 28, 2010 to August 27, 2010

Page 3 of 3

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	61,816		
Points	8,693		
Bonus Points	8,693		
Total Points	79,206		

If you are in a giving mood, consider using your Rewards Points toward a charity donation, green rewards or a gift card for someone special.

## Customer News

Your HSBC Premier World MasterCard has no preset spending limit. Because you never know when you might find just the right painting for your mantle. Or be invited to go heli-skiing in Alberta. Or discover that you need twelve tickets to the basketball game. See your HSBC Premier World MasterCard Terms and Conditions brochure for complete details.

140830 3 27 0000000411 G STMT11 D 6 12471 PME1



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 1 of 2

From August 27, 2010 to September 27, 2010

Summary of Account Activity	
Previous Balance	\$5,293.57
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$2,191.61
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$53.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$58.96</b>
New Balance	\$7,569.14
Revolving Credit Limit	\$10,000.00
Revolving Credit Available	\$2,430.86
Statement Closing Date	September 27, 2010
Days in Billing Cycle	31

Payment Information		
New Balance	\$7,569.14	\$213.00
Minimum Payment Due		October 22, 2010
Payment Due Date		
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about..	And you will end up paying an estimated total of..
Only the minimum Payment	24 Years	\$13,357
\$244	3 Years	\$8,791 (Savings = \$4,566)

If you would like information about credit counseling services call  
1-866-569-2227

## Questions?

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA  
93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE. CALL 800-724-4967 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

Transactions						
Purchases/Debits						
Trans Date	Post Date	Description of Transaction or Credit		Purchase Type	Reference Number	Amount
		08/27/10 2200 92 TRY				
08/27/10	08/28/10	ISTANBUL MARRIOTT HOTE	ISTANBUL TUR		MT102400102000010242437	\$1,451.03
09/03/10	09/08/10	SKYPE	44870835190 GBR		MT102510102000010092566	\$12.95
	09/12/10	228 56 VEF				
09/12/10	09/14/10	HOTEL TAMANACO	CARACAS 111		MT102570104000010236042	\$53.29
	09/21/10	101,00 EUR				
09/21/10	09/22/10	ARMANI JEANS	126 MILANO ITA		MT102650110000010180486	\$132.38
09/21/10	09/22/10	SALVATORE FERRAGAM	100 MILANO ITA		MT102650110000010180490	\$255.59
	09/23/10	215,00 EUR				
09/23/10	09/24/10	Adventure & Casual	Flughafen Wien AUT		MT102670104000010243644	\$286.37
<b>Total Purchases For This Period</b>						<b>\$2,191.61</b>

Detach and return bottom portion with your payment.

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See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$7,569.14  
Minimum Payment Due \$213.00  
Payment Due Date 10/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From August 27, 2010 to September 27, 2010

Page 2 of 2

Fees				
Trans Date	Post Date	Description of Fees	Reference Number	Amount
09/22/10	09/22/10	LATE CHARGE ASSESSMENT	10000004110000999646020	\$25.00
		<b>Total Fees For This Period</b>		<b>\$25.00</b>
Interest Charged				
Description of Interest Charge				
		INTEREST CHARGE ON CASH ADVANCES		\$0.00
		INTEREST CHARGE ON PURCHASES		\$58.96
		INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
		<b>Total Interest For This Period</b>		<b>\$58.96</b>
2010 Totals Year to Date				
		Total fees charged in 2010	\$65.00	
		Total interest charged in 2010	\$125.51	

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$6,949.14	\$58.96
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	79,206	Points	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

Customer News	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	

140830 5 27 000000411 G STM11 D 6 6093 PME1



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 1 of 3

From September 27, 2010 to October 28, 2010

Summary of Account Activity	
Previous Balance	\$7,569.14
Payments	-\$7,569.14
Other Credits	+\$0.00
Purchases/Debits	+\$5,664.36
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	+\$0.00
<b>Fees Charged</b>	<b>+\$0.00</b>
<b>Interest Charged</b>	<b>+\$0.00</b>
New Balance	\$5,664.36
Revolving Credit Limit	\$10,000.00
Revolving Credit Available	\$4,335.64
Statement Closing Date	October 28, 2010
Days in Billing Cycle	31

Payment Information		
New Balance	\$5,664.36	
Minimum Payment Due	\$57.00	
Payment Due Date		November 22, 2010
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee from \$15.00 to \$35.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	22 Years	\$9,980
\$183	3 Years	\$6,579 (Savings = \$3,401)

If you would like information about credit counseling services call  
1-866-569-2227

**Questions?**

24-Hour Customer Service

1-888-662-4722

Lost or Stolen Card

1-800-327-4214

Outside USA Collect

1-716-841-6866

TDD/Hearing Impaired

1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee

Transactions					
Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
09/29/10	09/29/10	PAYMENT - THANK YOU		6545198027201KQVKB39J3F	-\$7,569.14
		<b>Total Payment For This Period</b>			<b>-\$7,569.14</b>
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
		09/28/10 19.00 TRY			
09/28/10	09/29/10	GLORIA JEANS-ATU ISTANBUL TUR		MT10272010200010086938	\$12.94
09/28/10	09/30/10	A T U TURIZM/GIRIS A3 ISTANBUL TUR		MT10273010300010089229	\$12.34
		09/30/10 61.20 GBP			
09/30/10	10/01/10	AS GREEK AS IT GET LONDON SW5 GBR		MT10274010400010224915	\$96.57
10/01/10	10/02/10	FOXHALL UROLOGY WASHINGTON DC		MT10275010300010205224	\$846.00
		10/02/10 268.38 CAD			
10/02/10	10/04/10	MARCEL'S/ZAZOU TORONTO ON		MT102770101000010824657	\$260.84

Detach and return bottom portion with your payment.

140830 5 27 0000000411 G SIMTII D 6 6018 PME1

See reverse side for Important Information



Account Number: 5451-9846-6428-2280  
 New Balance \$5,664.36  
 Minimum Payment Due \$57.00  
 Payment Due Date 11/22/2010

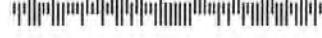
Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From September 27, 2010 to October 28, 2010

Page 2 of 3

10/03/10	10/04/10	DIMMI TRATTORIA & BAR TORONTO ON	MT102770104000010279743	\$52.88
10/01/10	10/05/10	COLUMBIA EYE ASSOCIQPS WASHINGTON DC	MT102780099000010075391	\$240.00
10/01/10	10/05/10	UNITED PUNE, MAHARAS IL  NAME: SADRHASHEMINEJAD/MOHAMMAD CTY OF ORGN: MISC C TRLV DT: 100210 CTY DEST: MISC C SVC PRVDR: UA FARE TYPE: Y STOPOVER: O	MT102780100000010246537	
		<b>Transaction Total</b>		\$66.00
10/04/10	10/05/10	HELENA W RODBARD MD FA ROCKVILLE MD	MT102780106000010172646	\$400.00
10/04/10	10/06/10	WASHINGTON ORTHOPAEDIC CHEVY CHASE MD	MT102790101000010205769	\$183.00
10/04/10	10/06/10	NEPH ASSOC OF N VA QPS FAIRFAX VA	MT102790102000010073990	\$250.00
10/04/10	10/06/10	QUALITY MEATS NEW YORK NY	MT102790103000010243956	\$338.32
10/05/10	10/06/10	AG SOHO NEW YORK NY	MT102790103000010254464	\$538.93
10/06/10	10/07/10	BEST BUY MHT 00002931 ROCKVILLE MD	MT102800110000010185175	\$764.96
10/06/10	10/07/10	YEKTA KABOBIRESTAURANT ROCKVILLE MD	MT102800110000010188200	\$61.86
10/07/10	10/08/10	CAPITAL GASTROENTEROLO GERMANTOWN MD	MT102810105000010245628	\$185.00
10/07/10	10/08/10	LABCORP CASH MDP85 GERMANTOWN MD	MT102810105000010248919	\$734.90
	10/09/10	32,00 GBP		
10/03/10	10/11/10	WWW.SKYPE COM INTERNET LUX	MT102840099000010866321	\$12.95
10/09/10	10/11/10	EXPRESS ONBOARD LONDON W2 GBR	MT102840099000010894669	\$50.76
	10/12/10	769.53 TRY		
10/12/10	10/14/10	MARRIOTT HOTEL ISTANBU ISTANBUL TUR	MT102870104000010243685	\$542.92
	10/21/10	33.00 TTD		
10/21/10	10/23/10	K F C PIARCO PIARCO TTO	MT102960102000010243837	\$5.21
	10/24/10	29.50 TTD		
10/24/10	10/26/10	K F C PIARCO PIARCO TTO	MT102990104000010250116	\$4.66
	10/24/10	21.00 TTD		
10/24/10	10/27/10	RITUALS DEPART/PIARCO TTO	MT103000101000010210461	\$3.32
		<b>Total Purchases For This Period</b>		\$5,664.36
		<b>Fees</b>		
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>	<b>Reference Number</b>	<b>Amount</b>
		Interest Charged		
		<b>Description of Interest Charge</b>		<b>Amount</b>

140850 5 27 0000000411 G 8TMTI1 D 6 6018 PME1



HSBC PREMIER WORLD MASTERCARD


 HSBC Premier World MasterCard Account Statement  
 Account Number 5451-9846-6428-2280  
 From September 27, 2010 to October 28, 2010

Page 3 of 3

INTEREST CHARGE ON CASH ADVANCES	\$0.00
INTEREST CHARGE ON PURCHASES	\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
<b>Total Interest For This Period</b>	<b>\$0.00</b>
<b>2010 Totals Year to Date</b>	
Total fees charged in 2010	\$65.00
Total interest charged in 2010	\$125.51

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	82,848	Points	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Total Points	88,513		

Customer News	
Buenos Aires. Bangkok. Belgrade. No matter where your travels take you, take along your HSBC Premier World MasterCard and pay no foreign transaction fees when you use your card.	

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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From October 28, 2010 to November 26, 2010

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$5,664.36
Payments	-\$5,675.44
Other Credits	\$0.00
Purchases/Debits	+\$510.03
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$0.00
Fees Charged	+\$0.00
Interest Charged	+\$0.00
New Balance	\$498.95
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$11,001.05
Statement Closing Date	November 26, 2010
Days in Billing Cycle	29

Payment Information		
New Balance	\$498.95	
Minimum Payment Due	\$15.00	
Payment Due Date		December 22, 2010
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay ..	You will pay off the balance shown on this statement in about ..	And you will end up paying an estimated total of...
Only the minimum payment	3 Years	\$586
If you would like information about credit counseling services call 1-866-569-2227.		

## Questions?

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

Payment Address: HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Retuns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
11/09/10	11/09/10	PAYMENT - THANK YOU		65451980313018FWKDVK5PP	-\$5,675.44
<b>Total Payment For This Period</b>					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
	10/29/10	8,00 EUR			
10/29/10	10/30/10	WWW.T-MOBILE.DE	BONN DEU	MT103030102000010064800	\$11.08
11/03/10	11/09/10	WWW.SKYPE.COM	INTERNET LUX	MT103130104000010244707	\$12.95
11/25/10	11/26/10	BAR CAFFE MEDA	MILANO ITA	MT103300095000010032457	\$486.00
<b>Total Purchases For This Period</b>					
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
<b>Interest Charged</b>					
<b>Description of Interest Charge</b>					
INTEREST CHARGE ON CASH ADVANCES					

Detach and return bottom portion with your payment.

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See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$498.95  
 Minimum Payment Due \$15.00  
 Payment Due Date 12/22/2010

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



5451984664282280000150000498954



## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From October 28, 2010 to November 26, 2010

Page 2 of 2

INTEREST CHARGE ON PURCHASES	\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
<b>Total Interest For This Period</b>	<b>\$0.00</b>
<b>2010 Totals Year-to-Date</b>	
Total fees charged in 2010	\$65.00
Total interest charged in 2010	\$125.51

## Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	88,513	If you are in a giving mood, consider using your Rewards Points toward a charity donation, green rewards or a gift card for someone special.
Points	310	
Total Points	89,023	

## Customer News

Your HSBC Premier World MasterCard has no preset spending limit. Because you never know when you might find just the right painting for your mantle. Or be invited to go heli-skiing in Alberta. Or discover that you need twelve tickets to the basketball game. See your HSBC Premier World MasterCard Terms and Conditions brochure for complete details.

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## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

From November 26, 2010 to December 28, 2010

Page 1 of 3

Summary of Account Activity	
Previous Balance	\$498.95
Payments	-\$13,249.49
Other Credits	-\$0.00
Purchases/Debits	+\$12,735.54
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	+\$0.00
<b>Fees Charged</b>	<b>+\$15.00</b>
<b>Interest Charged</b>	<b>+\$32.75</b>
New Balance	\$32.75
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$11,467.25
Statement Closing Date	December 28, 2010
Days in Billing Cycle	32

## Payment Information

New Balance	\$32.75
Minimum Payment Due	\$32.75
Payment Due Date	January 22, 2011

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.

**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	1 Months	\$33

If you would like information about credit counseling services call in 1-866-569-2227.

## Questions?

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
12/27/10	12/27/10	PAYMENT - THANK YOU		65451980361017P3FWHMC6X	-\$13,249.49
<b>Total Payment For This Period</b>					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
		12/03/10 8,50 GBP			
12/03/10	12/04/10	RN *REALNETWORKS MUSIC 866-212-1343 GBR		MT103380101000010069239	\$13.37
		12/04/10 69,90 EUR			
12/04/10	12/06/10	MASSIMO DUTTI SA MADRID ESP		MT103400101000010867424	\$92.93
12/04/10	12/07/10	PLUNA-WWW.F 2867940467 Uruguay URY		MT103410103000010092715	
		NAME: SADR HASHEMI NEJAD/S			
		CTY OF ORGN: MAD TRVL DT: 120610			
		CTY DEST: MVD SVC PRVDR: PU			
		FARE TYPE: Q STOPOVER:			
		<b>Transaction Total</b>			\$1,331.70

Detach and return bottom portion with your payment.

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See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$32.75  
 Minimum Payment Due \$32.75  
 Payment Due Date 01/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 2 of 3

From November 26, 2010 to December 28, 2010

Trans Date	Post Date	Description	Reference Number	Amount
12/03/10	12/09/10	WWW.SKYPE.COM INTERNET LUX	MT103430104000010303451	\$12.95
	12/10/10	200.00 TRY		
12/10/10	12/11/10	REINA BAR ISTANBUL TUR	MT103450102000010282807	\$133.87
	12/11/10	281.11 TRY		
12/11/10	12/13/10	A.T.U TURIZM/HERMES ISTANBUL TUR	MT103470101000010993112	\$188.16
12/11/10	12/13/10	DUTY FREE SHOP-TUR-YAT BAKIRK#Y\$STA TUR	MT103470104000010309083	\$549.13
12/11/10	12/13/10	DUTY FREE SHOP-TUR-YAT BAKIRK#Y\$STA TUR	MT103470104000010309084	\$459.90
	12/13/10	90.40 CHF		
12/13/10	12/14/10	Brasserie Seefeld Zrich CHE	MT103480103000010085023	\$92.70
12/13/10	12/14/10	Restaurant Oefelchamn Zrich CHE	MT103480103000010085025	\$200.78
12/13/10	12/15/10	MARRIOTT HOTEL ZURICH ZUERICH CHE	MT103490103000010291749	\$200.50
	12/15/10	135.00 CHF		
12/14/10	12/16/10	Restaurant Takumi Genve CHE	MT103500102000010093916	\$430.33
12/14/10	12/16/10	MARRIOTT HOTEL ZURICH ZUERICH CHE	MT103500103000010309988	\$5.20
12/15/10	12/16/10	swissotel le plaza basel CHE	MT103500102000010093909	\$140.33
	12/13/10	577.50 CHF		
		NAME: SADRHASHEMINEJAD/SEY		
		CTY OF ORGN: ZRH TRVL DT: 121410		
		CTY DEST: GVA SVC PRVDR: LX		
		FARE TYPE: STOPOVER:		
		<b>Transaction Total</b>		\$0.00
12/13/10	12/17/10	SWISS AIR 2123399032 ZURICH CHE	MT103510103000010296167	
		NAME: SADRHASHEMINEJAD/SEY		
		CTY OF ORGN: ZRH TRVL DT: 121410		
		CTY DEST: GVA SVC PRVDR: LX		
		FARE TYPE: STOPOVER:		
		<b>Transaction Total</b>		\$594.93
12/17/10	12/20/10	NATIONWIDE CREDIT CORP 703-6427500 VA	MT103540100000011051084	\$90.00
	12/22/10	6336.00 TRY		
12/22/10	12/23/10	IZGE TURIZM ORG. ISTANBUL TUR	MT103570104000010307156	\$4,099.38
12/22/10	12/23/10	IZGE TURIZM ORG. ISTANBUL TUR	MT103570104000010307157	\$4,099.38
		<b>Total Purchases For This Period</b>		\$12,735.54
		<b>Fees</b>		
Trans Date	Post Date	Description of Fees	Reference Number	Amount
12/22/10	12/22/10	LATE CHARGE ASSESSMENT	10000004110000999793050	\$15.00
		<b>Total Fees For This Period</b>		\$15.00
		<b>Interest Charged</b>		
Trans Date	Post Date	Description of Interest Charge	Reference Number	Amount

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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From November 26, 2010 to December 28, 2010

Page 3 of 3

INTEREST CHARGE ON CASH ADVANCES	\$0.00
INTEREST CHARGE ON PURCHASES	\$32.75
INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
<b>Total Interest For This Period</b>	<b>\$32.75</b>

2010 Totals Year to Date	
Total fees charged in 2010	\$80.00
Total interest charged in 2010	\$158.26

## Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$3,739.43	\$32.75
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	89,023
Points	12,733
<b>Total Points</b>	<b>101,756</b>

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

## Customer News

We have proactively increased your credit limit to the amount shown in "Revolving Credit Limit" above. If you have any questions or concerns, please call our Premier Service Center at (888) 662-HSBC (4722).

## Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

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HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From December 28, 2010 to January 28, 2011

Summary of Account Activity	
Previous Balance	\$32.75
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$12,731.84
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$32.75
Fees Charged	\$25.00
<b>Interest Charged</b>	<b>\$71.71</b>
New Balance	\$12,861.30
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	January 28, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$12,861.30	
Minimum Payment Due	\$258.75	
Payment Due Date	February 22, 2011	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...		And you will end up paying an estimated total of...
Only the minimum Payment	29 Years	\$23,061
<b>\$415</b>	<b>3 Years</b>	<b>\$14,937</b> ( <i>Savings = \$8,124</i> )

If you would like information about credit counseling services call 1-866-569-2227

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Your account is over the credit limit. Please pay your total due of \$1,562.30, which includes any additional over the credit limit amount and your Minimum Payment Due, minus any Past Due amount.

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE. CALL 800-724-4967 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

**Transactions**

Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
	12/28/10	12/28/10 2350.00 TRY			
12/28/10	12/29/10	IZGE TURIZM ORG ISTANBUL TUR		MT103630103000010232247	\$1,525.68
	01/03/11	01/03/11 8,50 GBP			
01/03/11	01/04/11	RN *REALNETWORKS MUSIC 866-212-1343 GBR		MT110040105000010071476	\$13.16
	01/09/11	01/09/11 32.90 TRY			
01/09/11	01/10/11	IGG GIIDA YATIRIMLARI A ISTANBUL TUR		MT110100102000010132646	\$21.13
	01/10/11	01/10/11 6090.00 TRY			
01/10/11	01/11/11	IZGE TURIZM ORG. ISTANBUL TUR		MT110110104000010226389	\$3,859.80
01/10/11	01/11/11	IZGE TURIZM ORG. ISTANBUL TUR		MT110110104000010226390	\$3,168.97
01/10/11	01/11/11	IZGE TURIZM ORG. ISTANBUL TUR		MT110110104000010226391	\$640.13

Detach and return bottom portion with your payment.

140830 5 27 0000000411 G STMTT1 D 6 11376 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$12,861.30  
Minimum Payment Due \$258.75  
Payment Due Date 02/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 3451-9846-6428-2280  
From December 28, 2010 to January 28, 2011

Page 2 of 2

01/10/11	01/11/11	IZGE TURIZM ORG.	ISTANBUL	TUR	MT110110104000010226392	\$864.49
01/10/11	01/11/11	IZGE TURIZM ORG	ISTANBUL	TUR	MT110110104000010226393	\$2,391.84
	01/11/11	365.00 TRY				
01/11/11	01/13/11	DOGA BALIK RESTORANT	ISTANBUL	TUR	MT110130103000010059844	\$233.69
01/10/11	01/17/11	WWW.SKYPE.COM	INTERNET	LUX	MT110170099000010130763	\$12.95
<b>Total Purchases For This Period</b>						<b>\$12,731.84</b>
<b>Fees</b>						
Trans Date	Post Date	Description of Fees			Reference Number	Amount
01/22/11	01/22/11	LATE CHARGE ASSESSMENT			10000004110000999606150	\$25.00
<b>Total Fees For This Period</b>						<b>\$25.00</b>
<b>Interest Charged</b>						
<b>Description of Interest Charge</b>						<b>Amount</b>
INTEREST CHARGE ON CASH ADVANCES						\$0.00
INTEREST CHARGE ON PURCHASES						\$71.71
INTEREST CHARGE ON BALANCE TRANSFERS						\$0.00
<b>Total Interest For This Period</b>						<b>\$71.71</b>
<b>2011 Totals Year to Date</b>						
Total fees charged in 2011						<b>\$25.00</b>
Total interest charged in 2011						<b>\$71.71</b>

<b>Interest Charge Calculation</b>			
Your <b>Annual Percentage Rate (APR)</b> is the annual interest rate on your account.			
<b>Type of Balance</b>	<b>Annual Percentage Rate (APR)</b>	<b>Balance Subject to Interest Rate</b>	<b>Interest Charge</b>
PURCHASES 10001	9.99% (v)	\$8,451.83	\$71.71
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00
<i>v=Variable Rate</i>			

<b>HSBC PREMIER REWARDS Summary</b>			
Previous Points	101,758	Points	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.

<b>Customer News</b>	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From January 28, 2011 to February 25, 2011

Summary of Account Activity	
Previous Balance	\$12,861.30
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$26.58
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$258.75
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$99.10</b>
New Balance	\$13,011.98
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	February 25, 2011
Days in Billing Cycle	28

Payment Information		
New Balance	\$13,011.98	
Minimum Payment Due	\$513.75	
Payment Due Date	March 22, 2011	
<b>late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	29 Years	\$23,126
\$420	3 Years	\$15,112 (Savings = \$8,014)

If you would like information about credit counseling services call 1-866-569-2227.

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

**IMPORTANT:** Starting March 18, 2011, Accounts with recurring charges (for example, monthly membership fees or bill pays) now require that the credit card be activated. After that date, recurring charges on Accounts that do not have the credit card activated will be declined. If you use your Account for recurring charges, please activate your credit card by calling the Customer Service number on the back of your card.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Your account is over the credit limit. Please pay your total due of \$1,741.98, which includes any additional over the credit limit amount and your Minimum Payment Due, minus any Past Due amount.

YOUR ACCOUNT IS NOW PAST DUE. PLEASE CALL TODAY TO MAKE YOUR PAYMENT OVER THE PHONE. CALL US AT 800-724-4967.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
	02/04/11	8.50 GBP			
02/04/11	02/05/11	RN *REALNETWORKS MUSIC 866-212-1343 GBR		MT110360101000010075101	\$13.63
02/10/11	02/15/11	SKYPE 44870835190 GBR		MT110460103000010078135	\$12.95
<b>Total Purchases For This Period</b>					<b>\$26.58</b>
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
02/22/11	02/22/11	LATE CHARGE ASSESSMENT		10000004110000999625170	\$25.00
<b>Total Fees For This Period</b>					<b>\$25.00</b>

Detach and return bottom portion with your payment.

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See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$13,011.98  
Minimum Payment Due \$513.75  
Payment Due Date 03/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



54519846642822800051375013011980



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 3451-9846-6428-2280  
From January 28, 2011 to February 25, 2011

Page 2 of 2

Interest Charged		Amount
Description of Interest Charge		
INTEREST CHARGE ON CASH ADVANCES		\$0.00
INTEREST CHARGE ON PURCHASES		\$99.10
INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
<b>Total Interest For This Period</b>		<b>\$99.10</b>
2011 Totals Year to Date		
Total fees charged in 2011		\$50.00
Total interest charged in 2011		\$170.81

#### Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$12,930.66	\$99.10
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

#### HSBC PREMIER REWARDS Summary

Previous Points	114,490
Points	27
Total Points	114,517

If you are in a giving mood, consider using your Rewards Points toward a charity donation, green rewards or a gift card for someone special.

#### Customer News

Your HSBC Premier World MasterCard has no preset spending limit. Because you never know when you might find just the right painting for your mantle. Or be invited to go heli-skiing in Alberta. Or discover that you need twelve tickets to the basketball game. See your HSBC Premier World MasterCard Terms and Conditions brochure for complete details.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From February 25, 2011 to March 28, 2011

Summary of Account Activity	
Previous Balance	\$13,011.98
Payments	-\$13,036.98
Other Credits	-\$0.00
Purchases/Debits	+\$0.00
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$100.20</b>
New Balance	\$100.20
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$11,399.80
Statement Closing Date	March 28, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$100.20	
Minimum Payment Due	\$100.20	
Payment Due Date		April 22, 2011
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	1 Months	\$100

If you would like information about credit counseling services call in 1-866-569-2227.

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Questions?**

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

**NOTICE OF CHANGES TO YOUR INTEREST RATE**

You have triggered the Penalty APR of 27.24% because we did not receive your minimum payment within 60 days of the due date. As of 05/28/2011, the Penalty APR will apply to all existing balances and new transactions on your account. Any existing promotional rates or plans will be cancelled and the Penalty APR will apply to these transactions as well.

If you make six consecutive on time minimum payments starting with your first payment due after 05/28/2011, your rate will return to the Standard APR or Promotional APR, if applicable. If you do not make these six consecutive on time minimum payments, we may keep the Penalty APR on your account indefinitely.

**Important Information**

**IMPORTANT:** Starting March 18, 2011, Accounts with recurring charges (for example, monthly membership fees or bill pays) now require that the credit card be activated. After that date, recurring charges on Accounts that do not have the credit card activated will be declined. If you use your Account for recurring charges, please activate your credit card by calling the Customer Service number on the back of your card.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

**Transactions****Payments/Returns/Credits**

Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount
03/26/11	03/26/11	PAYMENT - THANK YOU	65451981085015BWP46X2CN	-\$13,036.98
<b>Total Payment For This Period</b>				
				-\$13,036.98

**Purchases/Debits**

Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount

Detach and return bottom portion with your payment.

140830 5 27 0000000411 0 STMT66 D 6 2201 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$100.20  
Minimum Payment Due \$100.20  
Payment Due Date 04/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140  
AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



54519846642822800010020000100202



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From February 25, 2011 to March 28, 2011

Page 2 of 2

Fees			
Trans Date	Post Date	Description of Fees	Reference Number
03/22/11	03/22/11	LATE CHARGE ASSESSMENT	1000000411000099604240
<b>Total Fees For This Period</b>			<b>\$25.00</b>
Interest Charged			
Description of Interest Charge			Amount
INTEREST CHARGE ON CASH ADVANCES			\$0.00
INTEREST CHARGE ON PURCHASES			\$100.20
INTEREST CHARGE ON BALANCE TRANSFERS			\$0.00
<b>Total Interest For This Period</b>			<b>\$100.20</b>
<b>2011 Totals Year to Date</b>			
Total fees charged in 2011			<b>\$75.00</b>
Total interest charged in 2011			<b>\$271.01</b>

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$11,809.20	\$100.20
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	114,517	Points	Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges programme! Simply visit <a href="http://www.privileges.hsbcpremier.com">www.privileges.hsbcpremier.com</a> to find out more.

Customer News			
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.			



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 28, 2011 to April 27, 2011

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$100.20
Payments	\$12,962.76
Other Credits	\$0.00
Purchases/Debits	\$25,484.63
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$0.00</b>
<b>Interest Charged</b>	<b>\$0.00</b>
New Balance	\$12,622.07
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	April 27, 2011
Days in Billing Cycle	30

Payment Information		
New Balance	\$12,622.07	
Minimum Payment Due	\$127.00	
Payment Due Date	May 22, 2011	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	32 Years	\$40,589
\$517	3 Years	\$18,609 (Savings = \$21,980)

If you would like information about credit counseling services call  
1-866-569-2227**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297 -1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA  
93912 -0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Your account is over the credit limit. Please pay your total due of \$1,249.07, which includes any additional over the credit limit amount and your Minimum Payment Due, minus any Past Due amount.

**Transactions****Payments/Returns/Credits**

Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount
04/08/11	04/08/11	PAYMENT - THANK YOU	6545198109801HVMGTF45L	-\$12,962.76
<b>Total Payment For This Period</b>				<b>-\$12,962.76</b>

**Purchases/Debits**

Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
	03/29/11	10000.00 TRY			
03/29/11	03/30/11	IZGE TURIZM ORG. ISTANBUL TUR		MT110890102000010277487	\$6,431.28
03/29/11	03/30/11	IZGE TURIZM ORG. ISTANBUL TUR		MT110890102000010277488	\$6,431.28
04/11/11	04/12/11	IZGE TURIZM ORG. ISTANBUL TUR		MT111020104000010289171	\$664.32
04/11/11	04/12/11	IZGE TURIZM ORG. ISTANBUL TUR		MT111020104000010289172	\$1,992.96
04/11/11	04/12/11	IZGE TURIZM ORG. ISTANBUL TUR		MT111020104000010289173	\$6,643.19
04/11/11	04/12/11	IZGE TURIZM ORG. ISTANBUL TUR		MT111020104000010289174	\$3,321.60
<b>Total Purchases For This Period</b>					<b>\$25,484.63</b>

Detach and return bottom portion with your payment.

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See reverse side for Important Information



Account Number: 5451-9846-6428-2280  
New Balance \$12,622.07  
Minimum Payment Due \$127.00  
Payment Due Date 05/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 28, 2011 to April 27, 2011

Page 2 of 2

Fees			
Trans Date	Post Date	Description of Fees	Reference Number
Interest Charged			
Description of Interest Charge			Amount
		INTEREST CHARGE ON CASH ADVANCES	\$0.00
		INTEREST CHARGE ON PURCHASES	\$0.00
		INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
		<b>Total Interest For This Period</b>	<b>\$0.00</b>
2011 Totals Year to Date			
		Total fees charged in 2011	\$75.00
		Total interest charged in 2011	\$271.01

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 10001	9.99% (v)	\$0.00	\$0.00
CASH ADVANCES 20001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 41111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	114,517	Use your Rewards Points to get cash back. Or give back by using them to donate to charity or to support renewable energy sources.	
Points	25,484		
Total Points	140,001		

Customer News			
With 0% liability for unauthorized purchases, you can carry your HSBC Premier World MasterCard with confidence everywhere you go. To report unauthorized purchases, contact your Premier Relationship Manager or call 1 888 662-HSBC (4722)			



## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2011 to May 27, 2011

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$12,622.07
Payments	-\$0.00
Other Credits	-\$0.00
Purchases/Debits	+\$0.00
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$127.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$104.09</b>
New Balance	\$12,751.16
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	May 27, 2011
Days in Billing Cycle	30

## Payment Information

New Balance	\$12,751.16
Minimum Payment Due	\$384.00
Payment Due Date	June 22, 2011

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.

**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	29 Years	\$22,754
\$411	3 Years	\$14,810 (Savings = \$7,944)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE. CALL 800-724-4967 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Your account is over the credit limit. Please pay your total due of \$1,483.16, which includes any additional over the credit limit amount and your Minimum Payment Due, minus any Past Due amount.

## Transactions

Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
05/22/11	05/22/11	LATE CHARGE ASSESSMENT		10000004110521999633920	\$25.00
Total Fees For This Period					
Interest Charged					
Description of Interest Charge					
INTEREST CHARGE ON CASH ADVANCES					
INTEREST CHARGE ON PURCHASES					
INTEREST CHARGE ON BALANCE TRANSFERS					
Total Interest For This Period					
\$104.09					

Detach and return bottom portion with your payment.

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See reverse side for important information



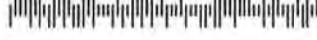
Account Number:	5451-9846-6428-2280
New Balance	\$12,751.16
Minimum Payment Due	\$384.00
Payment Due Date	06/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



01275116000384000005451984664282280001409



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2011 to May 27, 2011

Page 2 of 2

2011 Totals Year to Date	
Total fees charged in 2011	\$100.00
Total interest charged in 2011	\$375.10

**Interest Charge Calculation**

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	9.99% (v)	\$12,677.28	\$104.09
CASH ADVANCES 80001	21.99% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	9.99% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	140,001	Travel on your items. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or spending restrictions.
Points	0	
Total Points	140,001	

**Customer News**

Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges programme! Simply visit [www.privileges.hsbcpremier.com](http://www.privileges.hsbcpremier.com) to find out more.

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HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From May 27, 2011 to June 27, 2011

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$12,751.16
Payments	-\$13,083.98
Other Credits	\$0.00
Purchases/Debits	+\$7,586.56
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$0.00
Fees Charged	+\$0.00
Interest Charged	+\$0.00
New Balance	\$7,253.74
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$4,246.26
Statement Closing Date	June 27, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$7,253.74	
Minimum Payment Due	\$73.00	
Payment Due Date	July 22, 2011	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	27 Years	\$23,035
\$297	3 Years	\$10,694 (Savings = \$12,341)

If you would like information about credit counseling services call 1-866-569-2227

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions		Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount		
		06/05/11 26.95 TRY					
06/10/11	06/10/11	PAYMENT - THANK YOU		6545198116101CM6MPSX5SL	-\$13,083.98		
<b>Total Payment For This Period</b>							
Purchases/Debits							
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount		
06/05/11	06/06/11	MANGO TR TEKS CEVAHIR ISTANBUL TUR		MT111570109000010142166	\$17.09		
06/05/11	06/06/11	GUESS CEVAHIR ISTANBUL TUR		MT111570109000010148037	\$208.58		
06/05/11	06/06/11	GUESS CEVAHIR ISTANBUL TUR		MT111570109000010148038	\$107.15		
06/16/11	06/17/11	SCABAL UK LTD LONDON W1 GBR		MT111680114000010271758	\$6,930.64		
06/24/11	06/25/11	SWISSOTEL THE BOSPHORU ISTANBUL TUR		MT111760111000010063635	\$91.17		
		06/24/11 148.00 TRY					
06/24/11	06/27/11	GUNES RESTORAN TURIZM- ISTANBUL TUR		MT111780109000010769546	\$231.93		

Detach and return bottom portion with your payment.

140850 J 27 0000000411 STMT66 D 8 2204 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$7,253.74  
Minimum Payment Due \$73.00  
Payment Due Date 07/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From May 27, 2011 to June 27, 2011

Page 2 of 2

06/24/11	376.50 TRY			
<b>Total Purchases For This Period</b>	<b>\$7,586.56</b>			
<b>Fees</b>				
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>	<b>Reference Number</b>	<b>Amount</b>
<b>Interest Charged</b>				
<b>Description of Interest Charge</b>				<b>Amount</b>
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
<b>Total Interest For This Period</b>				<b>\$0.00</b>
<b>2011 Totals Year to Date</b>				
Total fees charged in 2011				\$100.00
Total interest charged in 2011				\$375.10

<b>Interest Charge Calculation</b>			
Your <b>Annual Percentage Rate (APR)</b> is the annual interest rate on your account.			
<b>Type of Balance</b>	<b>Annual Percentage Rate (APR)</b>	<b>Balance Subject to Interest Rate</b>	<b>Interest Charge</b>
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00
<i>v=Variable Rate</i>			

<b>HSBC PREMIER REWARDS Summary</b>			
Previous Points	140,001	Points	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions

<b>Customer News</b>	
Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges programme! Simply visit <a href="http://www.privileges.hsbcpremier.com">www.privileges.hsbcpremier.com</a> to find out more.	



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From June 27, 2011 to July 28, 2011

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$7,253.74
Payments	-\$9,468.86
Other Credits	\$0.00
Purchases/Debits	+\$3,349.85
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$0.00</b>
<b>Interest Charged</b>	<b>\$0.00</b>
New Balance	\$1,134.73
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$10,365.27
Statement Closing Date	July 28, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$1,134.73	
Minimum Payment Due	\$15.00	
Payment Due Date		August 22, 2011
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum payment	12 Years	\$3,017
\$46	3 Years	\$1,673 (Savings = \$1,344)

If you would like information about credit counseling services call 1-866-569-2227.

**Questions?**

24-Hour Customer Service 1-888-662-4722  
 Lost or Stolen Card 1-800-327-4214  
 Outside USA Collect 1-716-841-6866  
 TDD/Hearing Impaired 1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Refunds/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
07/14/11	07/14/11	PAYMENT - THANK YOU		6545198119501LM8CGB9TXH	-\$9,468.86
		<b>Total Payment For This Period</b>			<b>-\$9,468.86</b>
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
06/27/11	06/28/11	SWISSOTEL THE BOSPHORU ISTANBUL TUR		MT111790115000010269660	\$2,215.12
	06/27/11	3595.80 TRY			
07/10/11	07/15/11	TAP 0035121841579 AZ NAME: FAKORYMONAZAH/LADAN CTY OF ORGN: ZRH TRVL DT: 07/0111 CTY DEST: LIS SVC PRVDR: TP FARE TYPE: Q STOPOVER:		MT111960113000010179632	
		<b>Transaction Total</b>			<b>\$815.70</b>
07/23/11	07/25/11	EARTH TREKS - ROCKVILLE MD		MT112060111000010146087	\$15.90

Detach and return bottom portion with your payment.

140850 5 27 0000000411 STMT66 D 8 2239 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$1,134.73  
 Minimum Payment Due \$15.00  
 Payment Due Date 08/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



0011347300001500005451984664282280001401



## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From June 27, 2011 to July 28, 2011

Page 2 of 2

07/23/11	07/25/11	RNJ SPORTS	ROCKVILLE MD	MT112060113000010285915	\$303.13
<b>Total Purchases For This Period</b>					\$3,349.85
<b>Fees</b>					
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>		<b>Reference Number</b>	<b>Amount</b>
<b>Interest Charged</b>					
<b>Description of Interest Charge</b>					<b>Amount</b>
INTEREST CHARGE ON CASH ADVANCES					\$0.00
INTEREST CHARGE ON PURCHASES					\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS					\$0.00
<b>Total Interest For This Period</b>					\$0.00
<b>2011 Totals Year to Date</b>					
Total fees charged in 2011					\$100.00
Total interest charged in 2011					\$375.10

**Interest Charge Calculation**Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	147,988	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or sealing restrictions.
Points	3,350	
Total Points	150,938	

**Customer News**

Explore a variety of travel, dining, shopping and entertainment offers around the world with the new HSBC Premier Privileges programme! Simply visit [www.privileges.hsbcpremier.com](http://www.privileges.hsbcpremier.com) to find out more.

140830 5 27 0000000411 STMT66 D 8 2239 PME1



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From July 28, 2011 to August 28, 2011

Page 1 of 3

Summary of Account Activity	
Previous Balance	\$1,134.73
Payments	-\$18,396.74
Other Credits	\$0.00
Purchases/Debits	+\$19,184.93
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$0.00</b>
<b>Interest Charged</b>	<b>\$0.00</b>
New Balance	\$1,922.92
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$9,577.08
Statement Closing Date	August 28, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$1,922.92	
Minimum Payment Due	\$25.00	
Payment Due Date		September 22, 2011
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	12 Years	\$5,134
\$79	3 Years	\$2,835 (Savings = \$2,299)

If you would like information about credit counseling services call 1-866-569-2227.

**Questions?**

24-Hour Customer Service 1-888-662-4722  
 Lost or Stolen Card 1-800-327-4214  
 Outside USA Collect 1-716-841-6866  
 TDD/Hearing Impaired 1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD 21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Refunds/Credits					
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount	
08/08/11	08/08/11	PAYMENT - THANK YOU	65451981220012MP2FXGYY2	-\$6,224.63	
08/16/11	08/16/11	PAYMENT - THANK YOU	6545198122801GDVNP35KM	-\$12,172.11	
<b>Total Payment For This Period</b>				<b>-\$18,396.74</b>	
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
07/28/11	07/29/11	MAYO CLINIC STORE ROCHESTER MN		MT112100121000010184550	\$106.35
07/28/11	07/29/11	MAYO CLINIC STORE ROCHESTER MN		MT112100121000010184551	\$20.83
07/29/11	08/01/11	KAHLER GRAND ROCHESTER MN MRCH INV#: 000005451 ARRVL DT: 072911 DPRT DT: 072911 MRCH PH: 5072806200 PROPERTY PH: 5072806200		MT112130108000010768723	
<b>Transaction Total</b>					<b>\$2,416.35</b>

Detach and return bottom portion with your payment.

140850 3 27 0000000411 STMT66 D 8 2230 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$1,922.92  
 Minimum Payment Due \$25.00  
 Payment Due Date 09/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



00192292000025000005451984664282280001409



## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From July 28, 2011 to August 28, 2011

Page 2 of 3

07/30/11	08/01/11	ANDRE'S AT MONTE CARLO LAS VEGAS NV	MT112130113000010262170	\$459.89
08/01/11	08/03/11	BELLAGIO HOTEL & CASIN LAS VEGAS NV  MRCH INV#: 000005451 ARRVL DT: 080111 DPRT DT: 080111 MRCH PH: 8552755733 PROPERTY PH: 8552755733	MT112150114000010250472	
		<b>Transaction Total</b>		\$1,996.71
08/04/11	08/06/11	CHESTERS KITCHEN AND B ROCHESTER MN	MT112180111000010256481	\$89.77
08/05/11	08/08/11	PESCARA ROCHESTER MN	MT112200110000010802432	\$185.99
08/06/11	08/08/11	PESCARA ROCHESTER MN	MT112200114000010258762	\$166.94
08/07/11	08/08/11	SEQUOIA DC-202 NEW YORK NY	MT112200114000010254943	\$199.20
08/07/11	08/09/11	APPLE STORE #R112 BETHESDA MD	MT112210114000010190421	\$2,645.44
08/07/11	08/09/11	APPLE STORE #R112 BETHESDA MD	MT112210114000010190422	\$793.94
08/07/11	08/09/11	CVS PHARMACY #1479 Q03 BETHESDA MD	MT112210114000010194703	\$139.81
08/07/11	08/09/11	KAHLER GRAND ROCHESTER MN  MRCH INV#: 000005451 ARRVL DT: 080111 DPRT DT: 080711 MRCH PH: 5072806200 PROPERTY PH: 5072806200	MT112210116000010263489	
		<b>Transaction Total</b>		\$2,866.57
08/09/11	08/10/11	APL* APPLE ITUNES STORE 866-712-7753 CA	MT112220113000010196399	\$0.99
08/09/11	08/10/11	MACY*S EAST #0078 MCLEAN VA	MT112220115000010260326	\$234.68
08/09/11	08/10/11	MACY*S EAST #0078 MCLEAN VA	MT112220115000010260327	\$625.80
08/09/11	08/10/11	SAKS FIFTH AVENUE #000 MCLEAN VA	MT112220121000010174816	\$288.75
08/09/11	08/10/11	HUGO BOSS MCLEAN VA	MT112220121000010179228	\$1,107.75
08/09/11	08/10/11	HUGO BOSS MCLEAN VA	MT112220121000010179229	\$376.95
08/13/11	08/15/11	APL* APPLE ITUNES STORE 866-712-7753 CA	MT112270110000010765135	\$9.99
08/14/11	08/15/11	HUNTLEY HOTEL SM SANTA MONICA CA  MRCH INV#: 1753388 ARRVL DT: 081011 DPRT DT: 081411 MRCH PH: 3103945454 PROPERTY PH: 3103945454	MT112270110000010758528	
		<b>Transaction Total</b>		\$2,529.31
08/20/11	08/22/11	HERTZ RENT-A-CAR LOS ANGELES CA  AGRMNT#: 586382414 CK OUT DT: 081011 RTRN LOC: LOS ANGELES CA RTRN DT: 082011 MRCH PH: 8006544173	MT112340110000010155407	

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HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From July 28, 2011 to August 28, 2011

Page 3 of 3

586382414			
<b>Transaction Total</b>			\$1,922.92
<b>Total Purchases For This Period</b>			\$19,184.93
<b>Fees</b>			
<b>Trans Date</b>	<b>Post Date</b>	<b>Description of Fees</b>	<b>Reference Number</b>
			<b>Amount</b>
<b>Interest Charged</b>			
		<b>Description of Interest Charge</b>	<b>Amount</b>
		INTEREST CHARGE ON CASH ADVANCES	\$0.00
		INTEREST CHARGE ON PURCHASES	\$0.00
		INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
		<b>Total Interest For This Period</b>	<b>\$0.00</b>
<b>2011 Totals Year to Date</b>			
		Total fees charged in 2011	\$100.00
		Total interest charged in 2011	\$375.10

<b>Interest Charge Calculation</b>			
Your <b>Annual Percentage Rate (APR)</b> is the annual interest rate on your account.			
<b>Type of Balance</b>	<b>Annual Percentage Rate (APR)</b>	<b>Balance Subject to Interest Rate</b>	<b>Interest Charge</b>
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00
v=Variable Rate			

<b>HSBC PREMIER REWARDS Summary</b>			
Previous Points	150,938	Points	If you are in a giving mood, consider using your Rewards Points toward a charity donation, green rewards or a gift card for someone special.

<b>Customer News</b>	
Your HSBC Premier World MasterCard has no preset spending limit. Because you never know when you might find just the right painting for your mantle. Or be invited to go heli-skiing in Alberta. Or discover that you need twelve tickets to the basketball game. See your HSBC Premier World MasterCard Terms and Conditions brochure for complete details.	

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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From August 28, 2011 to September 27, 2011

Summary of Account Activity	
Previous Balance	\$1,922.92
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$19.99
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$23.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$43.98</b>
New Balance	\$2,011.89
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$9,488.11
Statement Closing Date	September 27, 2011
Days in Billing Cycle	30

Payment Information		
New Balance	\$2,011.89	
Minimum Payment Due	\$115.00	
Payment Due Date	October 22, 2011	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of. .
Only the minimum payment	12 Years	\$5,223
\$82	3 Years	\$2,966 (Savings = \$2,257)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service 1-888-662-4722  
 Lost or Stolen Card 1-800-327-4214  
 Outside USA Collect 1-716-841-6866  
 TDD/Hearing Impaired 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA  
93912-0029Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE. CALL 800-724-4967 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
09/05/11	09/06/11	APL*APPLE ITUNES STORE 866-712-7753 CA		MT11249010700010156466	\$19.99
<b>Total Purchases For This Period</b>					
					\$19.99
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
09/22/11	09/22/11	LATE CHARGE ASSESSMENT		10000004110922999664130	\$25.00
<b>Total Fees For This Period</b>					
					\$25.00
Interest Charged					
Description of Interest Charge					
INTEREST CHARGE ON CASH ADVANCES					
\$0.00					
INTEREST CHARGE ON PURCHASES					
\$43.98					

Detach and return bottom portion with your payment.

140850 5 27 0000000411 STMT66 D 8 2247 PMEI

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$2,011.89  
 Minimum Payment Due \$115.00  
 Payment Due Date 10/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From August 28, 2011 to September 27, 2011

Page 2 of 2

INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
<b>Total Interest For This Period</b>	<b>\$43.98</b>
<b>2011 Totals Year to Date</b>	
Total fees charged in 2011	\$125.00
Total interest charged in 2011	\$419.08

## Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$1,964.32	\$43.98
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	170,124	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	10	
Total Points	170,144	

## Customer News

Buenos Aires. Bangkok. Belgrade. No matter where your travels take you, take along your HSBC Premier World MasterCard and pay no foreign transaction fees when you use your card.



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From September 27, 2011 to October 28, 2011

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$2,011.89
Payments	\$0.00
Other Credits	\$0.02
Purchases/Debits	\$477.36
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$115.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$50.74</b>
New Balance	\$2,564.97
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	October 28, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$2,564.97	
Minimum Payment Due	\$217.00	
Payment Due Date	November 22, 2011	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	14 Years	\$6,812
\$105	3 Years	\$3,781 (Savings = \$3,031)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA  
93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

YOUR ACCOUNT IS NOW PAST DUE. PLEASE CALL TODAY TO MAKE YOUR PAYMENT OVER THE PHONE. CALL US AT 800-724-4967.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments/Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
05/20/11	10/17/11	INTEREST CHARGE ADJUSTMENT		0999999980520021629460	-\$0.02
<b>Total Payment For This Period</b>					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
10/19/11	10/20/11	H&M Kaerntnerstr. 149 Wien AUT		MT11293011000010204697	\$467.31
	10/19/11	338.75 EUR			
10/24/11	10/25/11	Rist Molino 729 Lacust Geneve CHE		MT112980121000010171598	\$10.05
	10/24/11	8.90 CHF			
<b>Total Purchases For This Period</b>					
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount

Detach and return bottom portion with your payment.

140830 3 A 27 0000000411 STMTT66 D 8 4139 PMET

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$2,564.97  
Minimum Payment Due \$217.00  
Payment Due Date 11/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



0025649700021700005451984664282280001401



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From September 27, 2011 to October 28, 2011

Page 2 of 2

10/22/11	10/22/11	LATE CHARGE ASSESSMENT	10000004111022999653960	\$25.00
<b>Total Fees For This Period</b>				
<b>Interest Charged</b>				
<b>Description of Interest Charge</b>				<b>Amount</b>
INTEREST CHARGE ON CASH ADVANCES				\$0.00
INTEREST CHARGE ON PURCHASES				\$50.74
INTEREST CHARGE ON BALANCE TRANSFERS				\$0.00
<b>Total Interest For This Period</b>				<b>\$50.74</b>
<b>2011 Total: Year to Date</b>				
Total fees charged in 2011				\$150.00
Total interest charged in 2011				\$469.80

**Interest Charge Calculation**

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$2,193.08	\$50.74
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	170,144	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or testing restrictions.
Points	477	
Total Points	170,621	

**Customer News**

Buenos Aires. Bangkok. Belgrade. No matter where your travels take you, take along your HSBC Premier World MasterCard and pay no foreign transaction fees when you use your card



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From October 28, 2011 to November 27, 2011

Page 1 of 2

Summary of Account Activity		Payment Information	
Previous Balance	\$2,564.97	New Balance	\$0.00
Payments	-\$2,564.97	Minimum Payment Due	\$0.00
Other Credits	+\$0.00	Payment Due Date	December 22, 2011
Purchases/Debits	+\$0.00		
Balance Transfers	+\$0.00		
Cash Advances	+\$0.00		
Past Due Amount	\$0.00		
<b>Fees Charged</b>	<b>+\$0.00</b>		
<b>Interest Charged</b>	<b>+\$0.00</b>		
New Balance	\$0.00		
Revolving Credit Limit	\$11,500.00		
Revolving Credit Available	\$11,500.00		
Statement Closing Date	November 27, 2011		
Days in Billing Cycle	30		

## Questions?

24-Hour Customer Service

1-888-662-4722

Lost or Stolen Card

1-800-327-4214

Outside USA Collect

1-716-841-6866

TDD/Hearing Impaired

1-800-655-9392

Payment Address: HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

## Transactions

## Payments/Returns/Credits

Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount
11/15/11	11/15/11	PAYMENT - THANK YOU	6545198131901Y09XQZSFKQ	-\$2,564.97
<b>Total Payment For This Period</b>				<b>-\$2,564.97</b>

## Fees

Trans Date	Post Date	Description of Fees	Reference Number	Amount
<b>Interest Charged</b>				

## Description of Interest Charge

## Amount

INTEREST CHARGE ON CASH ADVANCES

\$0.00

INTEREST CHARGE ON PURCHASES

\$0.00

INTEREST CHARGE ON BALANCE TRANSFERS

\$0.00

**Total Interest For This Period**

\$0.00

## 2011 Totals Year to Date

Total fees charged in 2011 \$150.00

Total interest charged in 2011 \$469.80

## Interest Charge Calculation

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

Detach and return bottom portion with your payment.

140830 3 27 0000000111 STMTXT 3 8 3777 EXCPT

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$0.00  
Minimum Payment Due \$0.00  
Payment Due Date 12/22/2011

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



000000000000000000000000000000005451984664282280001409



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From October 28, 2011 to November 27, 2011

Page 2 of 2

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	170,621	Get something special for someone special. Use your Rewards Points toward a gift card. Call 1-888-662-(HSBC) 4722 for details.
Points	0	
Total Points	170,621	

## Customer News

Whether the price tag is in rupees, rands or rubles, pay with your HSBC Premier World MasterCard and you pay no foreign transaction fees.

140850 5 27 0000000411 STMTXT 3 8 3777 EXCPT



## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From November 27, 2011 to December 28, 2011

Summary of Account Activity	
Previous Balance	\$0.00
Payments	-\$0.00
Other Credits	+\$0.00
Purchases/Debits	+\$2,039.50
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>+\$0.00</b>
<b>Interest Charged</b>	<b>+\$0.00</b>
New Balance	\$2,039.50
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$9,460.50
Statement Closing Date	December 28, 2011
Days in Billing Cycle	31

Payment Information		
New Balance	\$2,039.50	
Minimum Payment Due	\$25.00	
Payment Due Date	January 22, 2012	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	13 Years	\$5,518
\$84	3 Years	\$3,007 ( <i>Savings</i> = \$2,511)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

## Transactions

Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
12/24/11	12/26/11	DUTY FREE DE PANAMA, S PANAMA PAN		MT113600107000010870785	\$630.00
12/24/11	12/26/11	SUBWAY AEROPUERTO TOCU PANAMA PAN		MT113600109000010165492	\$9.00
12/24/11	12/27/11	HAVANA HUMIDOR NASSAU BHS		MT113610110000010195690	\$625.00
12/26/11	12/28/11	LA RIVIERA DUTY FREE # PANAMA PAN		MT113620113000010062302	\$20.50
12/26/11	12/28/11	DUTY FREE DE PANAMA, S PANAMA PAN		MT113620114000010241409	\$72.00
12/26/11	12/28/11	ATTENZA H BOSS PANAMA PAN		MT113620114000010241421	\$103.00
12/26/11	12/28/11	SKY PHONE N1 PANAMA PAN		MT113620122000010146651	\$580.00
<b>Total Purchases For This Period</b>					<b>\$2,039.50</b>
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount

Detach and return bottom portion with your payment.

140850 5 27 0000000411 STM766 D 8 2364 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$2,039.50  
 Minimum Payment Due \$25.00  
 Payment Due Date 01/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



0020395000002500005451984664282280001409



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From November 27, 2011 to December 28, 2011

Page 2 of 2

Interest Charged		Amount
Description of Interest Charge		
INTEREST CHARGE ON CASH ADVANCES		\$0.00
INTEREST CHARGE ON PURCHASES		\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
<b>Total Interest For This Period</b>		<b>\$0.00</b>
<b>2011 Totals Year to Date</b>		
Total fees charged in 2011		\$150.00
Total interest charged in 2011		\$469.80

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	170,621	Points	Get something special for someone special. Use your Rewards Points toward a gift card. Call 1-888-662-(HSBC) 4722 for details.

Customer News			
Whether the price tag is in rupees, rands or rubles, pay with your HSBC Premier World MasterCard and you pay no foreign transaction fees			

140850 5 27 0000000411 8TMT66 D 8 2364 PME1



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From December 28, 2011 to January 27, 2012

Summary of Account Activity	
Previous Balance	\$2,039.50
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$341.97
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$25.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$52.05</b>
New Balance	\$2,458.52
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$9,041.48
Statement Closing Date	January 27, 2012
Days in Billing Cycle	30

Payment Information		
New Balance	\$2,458.52	
Minimum Payment Due	\$127.00	
Payment Due Date	February 22, 2012	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	14 Years	\$6,666
\$101	3 Years	\$3,624 ( <i>Savings</i> = \$3,042)

If you would like information about credit counseling services call  
1-866-569-2227**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA  
93912-0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE. CALL 800-724-4967 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
01/11/12	01/12/12	APL*APPLE ITUNES STORE 866-712-7753 CA		MT120120111000010165329	\$29.99
01/05/12	01/17/12	Aeroport Int. Geneve Geneve Airport CHE 01/05/12 298.00 CHF		MT120170109000010160373	\$311.98
<b>Total Purchases For This Period</b>					\$341.97
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
01/22/12	01/22/12	LATE CHARGE ASSESSMENT		10000004110121999564670	\$25.00
<b>Total Fees For This Period</b>					\$25.00
Interest Charged					
Description of Interest Charge					
INTEREST CHARGE ON CASH ADVANCES					\$0.00
INTEREST CHARGE ON PURCHASES					\$52.05

Detach and return bottom portion with your payment.

140850 3 27 0000000411 STMT66 D 8 4411 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$2,458.52  
Minimum Payment Due \$127.00  
Payment Due Date 02/22/2012

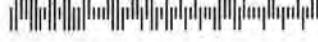
Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



0024585200012700005451984664282280001401



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From December 28, 2011 to January 27, 2012

Page 2 of 2

INTEREST CHARGE ON BALANCE TRANSFERS	\$0.00
<b>Total Interest For This Period</b>	<b>\$52.05</b>
<b>2012 Totals Year to Date</b>	
Total fees charged in 2012	\$25.00
Total interest charged in 2012	\$52.05

**Interest Charge Calculation**

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$2,324.98	\$52.05
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	172,661	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	342	
Total Points	173,003	

**Customer News**

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

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## HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From January 27, 2012 to February 26, 2012

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$2,458.52
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$0.00
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$127.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$55.74</b>
New Balance	\$2,539.26
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	February 26, 2012
Days in Billing Cycle	30

Payment Information		
New Balance	\$2,539.26	
Minimum Payment Due	\$234.00	
Payment Due Date	March 22, 2012	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	14 Years	\$6,689
\$104	3 Years	\$3,744 (Savings = \$2,945)

If you would like information about credit counseling services call 1-866-569-2227.

## Questions?

24-Hour Customer Service 1-888-662-4722  
 Lost or Stolen Card 1-800-327-4214  
 Outside USA Collect 1-716-841-6866  
 TDD/Hearing Impaired 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 17332, Baltimore, MD

21297-1332

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA  
93912-0029Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

YOUR ACCOUNT IS NOW PAST DUE. PLEASE CALL TODAY TO MAKE YOUR PAYMENT OVER THE PHONE. CALL US AT 800-724-4967.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions						
Purchases/Debits						
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount	
<b>Fees</b>						
Trans Date	Post Date	Description of Fees		Reference Number	Amount	
02/22/12	02/22/12	LATE CHARGE ASSESSMENT		10000004110222999646910	\$25.00	
<b>Total Fees for This Period</b>						
<b>Interest Charged</b>						
Description of Interest Charge						
INTEREST CHARGE ON CASH ADVANCES						
INTEREST CHARGE ON PURCHASES						
INTEREST CHARGE ON BALANCE TRANSFERS						
<b>Total Interest For This Period</b>						
\$55.74						

Detach and return bottom portion with your payment.

140830 3 A 27 0000000411 STMT66 D 8 2248 PMET

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$2,539.26  
 Minimum Payment Due \$234.00  
 Payment Due Date 03/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927



HSBC CARD SERVICES  
PO BOX 17332  
BALTIMORE MD 21297-1332



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HSBC PREMIER WORLD MASTERCARD


 HSBC Premier World MasterCard Account Statement  
 Account Number 5451-9846-6428-2280  
 From January 27, 2012 to February 26, 2012

Page 2 of 2

## 2012 Totals Year to Date

Total fees charged in 2012	\$50.00
Total interest charged in 2012	\$107.79

## Interest Charge Calculation

Your Annual Percentage Rate (APR) is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$2,489.47	\$55.74
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	173,003	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	0	
Total Points	173,003	

## Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From February 26, 2012 to March 28, 2012

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$2,539.26
Payments	-\$2,564.26
Other Credits	\$0.00
Purchases/Debits	+\$2,520.66
Balance Transfers	+\$0.00
Cash Advances	+\$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$55.60</b>
New Balance	\$2,576.26
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	March 28, 2012
Days in Billing Cycle	31

Payment Information		
New Balance	\$2,576.26	
Minimum Payment Due	\$107.00	
Payment Due Date	April 22, 2012	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	14 Years	\$7,099
\$106	3 Years	\$3,798 (Savings = \$3,301)

If you would like information about credit counseling services call  
1-866-569-2227**Questions?**

24-Hour Customer Service

1-888-662-4722

Lost or Stolen Card

1-800-327-4214

Outside USA Collect

1-716-841-6866

TDD/Hearing Impaired

1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments>Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
03/24/12	03/24/12	PAYMENT BY PHONE - THANK YOU		6545198208400JRX4ZMTRJN	-\$2,564.26
<b>Total Payment For This Period</b>					
\$-2,564.26					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
03/26/12	03/27/12	EY PROSPEKT STORE MINSK BLR		MT120870121000010169866	\$2,520.66
03/26/12 20165.260 BYR					
<b>Total Purchases For This Period</b>					
\$2,520.66					
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
03/22/12	03/22/12	LATE CHARGE ASSESSMENT		10000004110322999604350	\$25.00
<b>Total Fees for This Period</b>					
\$25.00					

Detach and return bottom portion with your payment.

140830 4 Y 27 0000000411 STMT66 D 8 490 PMEI

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$2,576.26  
 Minimum Payment Due \$107.00  
 Payment Due Date 04/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255



0025762600010700005451984664282280001408



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From February 26, 2012 to March 28, 2012

Page 2 of 2

Interest Charged		Amount
Description of Interest Charge		
INTEREST CHARGE ON CASH ADVANCES		\$0.00
INTEREST CHARGE ON PURCHASES		\$55.60
INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
<b>Total Interest For This Period</b>		<b>\$55.60</b>
2012 Totals Year to Date		
Total fees charged in 2012	\$75.00	
Total interest charged in 2012	\$163.39	

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$2,403.45	\$55.60
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points	173,003	Points	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
	2,521		
Total Points	175,524		

Customer News			
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.			

140850 4 Y 27 0000000411 STM766 D 8 490 PME1



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 28, 2012 to April 27, 2012

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$2,576.26
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$0.00
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$107.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$58.42</b>
New Balance	\$2,659.68
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$0.00
Statement Closing Date	April 27, 2012
Days in Billing Cycle	30

Payment Information		
New Balance	\$2,659.68	
Minimum Payment Due	\$218.00	
Payment Due Date	May 22, 2012	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	14 Years	\$7,121
\$109	3 Years	\$3,921 (Savings = \$3,200)

If you would like information about credit counseling services call  
1-866-569-2227**Questions?**

24-Hour Customer Service

1-888-662-4722

Lost or Stolen Card

1-800-327-4214

Outside USA Collect

1-716-841-6866

TDD/Hearing Impaired

1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 5255, Carol Stream, IL

60197-5255

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information****PLEASE NOTE:** Some HSBC correspondence addresses may have changed. Please commence using the addresses listed in the above section, on this statement immediately for future correspondence.

PROTECT YOUR CREDIT RATING YOUR ACCOUNT IS PAST DUE. CALL 855-227-4165 TODAY TO MAKE YOUR PAYMENT. THANK YOU.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
<b>Fees</b>					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
04/22/12	04/22/12	LATE CHARGE ASSESSMENT		10000004110421999653760	\$25.00
<b>Total Fees for This Period</b>					
<b>Interest Charged</b>					
<b>Description of Interest Charge</b>					
INTEREST CHARGE ON CASH ADVANCES					
INTEREST CHARGE ON PURCHASES					
INTEREST CHARGE ON BALANCE TRANSFERS					
<b>Total Interest For This Period</b>					
\$58.42					

Detach and return bottom portion with your payment.

140830 4 Y 27 0000000411 STMT66 D 8 906 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$2,659.68  
 Minimum Payment Due \$218.00  
 Payment Due Date 05/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255



0026596800021800005451984664282280001409



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From March 28, 2012 to April 27, 2012

Page 2 of 2

2012 Totals Year to Date	
Total fees charged in 2012	\$100.00
Total interest charged in 2012	\$221.81

**Interest Charge Calculation**

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$2,609.34	\$58.42
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	175,524	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	0	
Total Points	175,524	

**Customer News**

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

140830 4 Y 27 0000000411 STMT66 D 8 906 PME1



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2012 to May 28, 2012

Page 1 of 2

Summary of Account Activity		Payment Information
Previous Balance	\$2,659.68	\$0.00
Payments	-\$2,659.68	\$0.00
Other Credits	-\$0.00	June 22, 2012
Purchases/Debits	+\$0.00	
Balance Transfers	+\$0.00	
Cash Advances	+\$0.00	
Past Due Amount	\$0.00	
<b>Fees Charged</b>	+\$0.00	
<b>Interest Charged</b>	+\$0.00	
New Balance	\$0.00	
Revolving Credit Limit	\$11,500.00	
Revolving Credit Available	\$0.00	
Statement Closing Date	May 28, 2012	
Days in Billing Cycle	31	

## Questions?

24-Hour Customer Service

1-888-662-4722

Lost or Stolen Card

1-800-327-4214

Outside USA Collect

1-716-841-6866

TDD/Hearing Impaired

1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL

60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

PLEASE NOTE: Some HSBC correspondence addresses may have changed. Please commence using the addresses listed in the above section, on this statement immediately for future correspondence.

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions							
Payments/Returns/Credits							
Trans Date	Post Date	Description of Transaction or Credit	Reference Number	Amount			
05/14/12	05/15/12	PAYMENT THANK YOU	45451982136014126203280	-\$2,659.68			
		<b>Total Payment For This Period</b>		-\$2,659.68			
Fees							
Trans Date	Post Date	Description of Fees	Reference Number	Amount			
		<b>Total Fees For This Period</b>		\$0.00			
Interest Charged							
Description of Interest Charge							
		INTEREST CHARGE ON CASH ADVANCES		\$0.00			
		INTEREST CHARGE ON PURCHASES		\$0.00			
		INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00			
		<b>Total Interest For This Period</b>		\$0.00			
2012 Totals Year to Date							
		Total fees charged in 2012	\$100.00				
		Total interest charged in 2012	\$221.81				

Detach and return bottom portion with your payment.

140830 4 Y 27 0000000411 STM TX6 3 8 291 EXCPT

See reverse side for important information

Account Number: 5451-9846-6428-2280  
New Balance \$0.00  
Minimum Payment Due \$0.00  
Payment Due Date 06/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSEDALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255

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HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From April 27, 2012 to May 28, 2012

Page 2 of 2

## Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

## HSBC PREMIER REWARDS Summary

Previous Points	175,324	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	0	
Total Points	175,324	

## Customer News

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

140830 4 Y 27 0000000411 STMTX6 3 8 291 EXCPT



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From May 28, 2012 to August 28, 2012

Page 1 of 2

Summary of Account Activity		Payment Information	
Previous Balance	\$0.00	New Balance	\$0.00
Payments	-\$0.00	Minimum Payment Due	\$0.00
Other Credits	+\$747.22	Payment Due Date	September 22, 2012
Purchases/Debits	+\$747.22		
Balance Transfers	\$0.00		
Cash Advances	\$0.00		
Past Due Amount	\$0.00		
<b>Fees Charged</b>	<b>\$0.00</b>		
<b>Interest Charged</b>	<b>\$0.00</b>		
New Balance	\$0.00		
Revolving Credit Limit	\$11,500.00		
Revolving Credit Available	\$11,500.00		
Statement Closing Date	August 28, 2012		
Days in Billing Cycle	32		

## Questions?

24-Hour Customer Service 1-888-662-4722  
Lost or Stolen Card 1-800-327-4214  
Outside USA Collect 1-716-841-6866  
TDD/Hearing Impaired 1-800-655-9392

Payment Address: HSBC Card Services, PO Box 5255, Carol Stream, IL

60197-5255

Billing Inquiries: HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Payments>Returns/Credits					
Trans Date	Post Date	Description of Transaction or Credit		Reference Number	Amount
08/22/12	08/24/12	Marina View Hotel Apar Dubai AE		MT122370112000010233997	-\$747.22
<b>Total Payment For This Period</b>					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
08/22/12	08/24/12	Marina View Hotel Apar Dubai AB		MT122370112000010233996	\$747.22
	08/22/12	2744.40 AED			
<b>Total Purchases For This Period</b>					
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
		<b>Total Fees For This Period</b>			\$0.00
Interest Charged					
Description of Interest Charge					
		INTEREST CHARGE ON CASH ADVANCES			\$0.00
		INTEREST CHARGE ON PURCHASES			\$0.00
		INTEREST CHARGE ON BALANCE TRANSFERS			\$0.00
<b>Total Interest For This Period</b>					

Detach and return bottom portion with your payment.

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See reverse side for important information



Account Number: 5451-9846-6428-2280  
New Balance \$0.00  
Minimum Payment Due \$0.00  
Payment Due Date 09/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255



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HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6428-2280  
From May 28, 2012 to August 28, 2012

Page 2 of 2

2012 Totals Year to Date	
Total fees charged in 2012	\$100.00
Total interest charged in 2012	\$221.81

**Interest Charge Calculation**

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	175,524	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	0	
Total Points	175,524	

**Customer News**

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.



## HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 1 of 2

From August 28, 2012 to September 27, 2012

Summary of Account Activity		Payment Information
Previous Balance	\$0.00	\$173.45
Payments	-\$0.00	\$25.00
Other Credits	-\$0.00	October 22, 2012
Purchases/Debits	+\$173.45	
Balance Transfers	+\$0.00	
Cash Advances	+\$0.00	
Past Due Amount	+\$0.00	
<b>Fees Charged</b>	<b>+\$0.00</b>	
<b>Interest Charged</b>	<b>+\$0.00</b>	
New Balance	\$173.45	
Revolving Credit Limit	\$11,500.00	
Revolving Credit Available	\$11,326.55	
Statement Closing Date	September 27, 2012	
Days in Billing Cycle	30	

## Questions?

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

**Late Payment Warning:** If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.

**Minimum Payment Warning:** If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	8 Months	\$191

If you would like information about credit counseling services call in 1-866-569-2227.

**Payment Address:** HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

Manage Your account online at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

## Important Information

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
09/13/12	09/15/12	BUYUK SEFLER GIDA TU R ISTANBUL TUR		MT122590109000010224647	\$53.75
		09/13/12 96 00 TRY			
09/23/12	09/25/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122690119000010121571	\$19.95
09/23/12	09/25/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122690119000010121572	\$19.95
09/23/12	09/25/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122690119000010121573	\$19.95
09/23/12	09/25/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122690119000010121574	\$19.95
09/23/12	09/25/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122690119000010121575	\$19.95
09/23/12	09/25/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122690119000010121576	\$19.95
Total Purchases For This Period					
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
Total Fees For This Period					

Detach and return bottom portion with your payment.

1408304 27 0000000411 STM166 D 8 511 PME1

See reverse side for important information



Account Number: 5451-9846-6428-2280  
 New Balance \$173.45  
 Minimum Payment Due \$25.00  
 Payment Due Date 10/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
7117 NATELLI WOODS LN  
BETHESDA MD 20817-3927

HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255



0001734500002500005451984664282280001408



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 2 of 2

From August 28, 2012 to September 27, 2012

Interest Charged		Amount
Description of Interest Charge		
INTEREST CHARGE ON CASH ADVANCES		\$0.00
INTEREST CHARGE ON PURCHASES		\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
<b>Total Interest For This Period</b>		<b>\$0.00</b>
<b>2012 Totals/Year to Date</b>		
Total fees charged in 2012		\$100.00
Total interest charged in 2012		\$221.81

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

HSBC PREMIER REWARDS Summary			
Previous Points Points	175,524 174		Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or sealing restrictions.

Customer News			
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.			

140830 4 27 0000000411 STM766 D 8 511 PME1



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 1 of 2

From September 27, 2012 to October 28, 2012

Summary of Account Activity	
Previous Balance	\$173.45
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$19.95
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$25.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$4.34</b>
New Balance	\$222.74
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$11,277.26
Statement Closing Date	October 28, 2012
Days in Billing Cycle	31

Payment Information		
New Balance	\$222.74	
Minimum Payment Due	\$57.00	
Payment Due Date		November 22, 2012
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay ..	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of..
Only the minimum Payment	9 Months	\$244
If you would like information about credit counseling services call in 1-866-569-2227.		

**Questions?**

24-Hour Customer Service  
Lost or Stolen Card  
Outside USA Collect  
TDD/Hearing Impaired

1-888-662-4722  
1-800-327-4214  
1-716-841-6866  
1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912-0029

**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)

**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
10/19/12	10/20/12	PAYPAL *MEDIALAYER 4029357733 CA		MT122940114000010060345	\$19.95
<b>Total Purchases For This Period</b>					
\$19.95					
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
10/22/12	10/22/12	LATE CHARGE ASSESSMENT		10000004111022999602150	\$25.00
<b>Total Fees for This Period</b>					
\$25.00					
Interest Charged					
Description of Interest Charge					
INTEREST CHARGE ON CASH ADVANCES					
\$0.00					
INTEREST CHARGE ON PURCHASES					
\$4.34					
INTEREST CHARGE ON BALANCE TRANSFERS					
\$0.00					
<b>Total Interest For This Period</b>					
\$4.34					

Detach and return bottom portion with your payment.

140850 4 27 0000000411 STMT66 D 8 510 PMZ1

See reverse side for Important Information



Account Number: 5451-9846-6428-2280  
New Balance \$222.74  
Minimum Payment Due \$57.00  
Payment Due Date 11/22/2012

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
6445 ROCK FOREST DR  
APT 209  
BETHESDA MD 20817-9802

HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255



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HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6428-2280

Page 2 of 2

From September 27, 2012 to October 28, 2012

2012 Totals Year to Date	
Total fees charged in 2012	\$125.00
Total interest charged in 2012	\$226.15

**Interest Charge Calculation**Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$187.50	\$4.34
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

v=Variable Rate

**HSBC PREMIER REWARDS Summary**

Previous Points	175,698	Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions.
Points	10	
Total Points	175,718	

**Customer News**

Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.

140850 4 27 0000000411 STMT66 D 8 510 PME1



HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement

Account Number 5451-9846-6573-9288

From November 27, 2012 to December 28, 2012

Page 1 of 2

Summary of Account Activity	
Previous Balance	\$0.00
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	+ \$5,524.51
Balance Transfers	+ \$0.00
Cash Advances	+ \$0.00
Past Due Amount	\$0.00
<b>Fees Charged</b>	+ \$0.00
<b>Interest Charged</b>	+ \$0.00
New Balance	<b>\$5,524.51</b>
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$5,975.49
Statement Closing Date	December 28, 2012
Days in Billing Cycle	31

Payment Information		
New Balance	\$5,524.51	
Minimum Payment Due	\$56.00	
Payment Due Date	January 22, 2013	
<b>Late Payment Warning:</b> If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.		
<b>Minimum Payment Warning:</b> If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:		
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	21 Years	\$16,923
\$226	3 Years	\$8,145 ( <i>Savings = \$8,778</i> )

If you would like information about credit counseling services call 1-866-569-2227.

**Questions?**

24-Hour Customer Service	1-888-662-4722
Lost or Stolen Card	1-800-327-4214
Outside USA Collect	1-716-841-6866
TDD/Hearing Impaired	1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 5255, Carol Stream, IL 60197-5255**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA 93912 -0029**Manage Your account online at** [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
12/05/12	12/06/12	THY - WWW THY COM ISTANBUL TUR		MT123410116000010188555	\$5,324.90
12/10/12	12/11/12	YAKAMOZ RES.SU URN.GID ISTANBUL TUR		MT123460120000010193204	\$162.67
	12/10/12	290.00 TRY			
12/12/12	12/13/12	BTA-LIPTON ISTANBUL TUR		MT123480120000010076951	\$4.24
	12/12/12	7.50 TRY			
12/16/12	12/17/12	BODRUM MANTI CAFE ISTANBUL TUR		MT123520118000010214628	\$32.70
	12/16/12	58.00 TRY			
<b>Total Purchases For This Period</b>					<b>\$5,524.51</b>
Fees					
Trans Date	Post Date	Description of Fees		Reference Number	Amount
<b>Total Fees For This Period</b>					<b>\$0.00</b>

Detach and return bottom portion with your payment.

140850 4 27 0000000411 STMT66 D 8 898 PME1

See reverse side for important information



Account Number: 5451-9846-6573-9288  
 New Balance \$5,524.51  
 Minimum Payment Due \$56.00  
 Payment Due Date 01/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140  
AMOUNT  
ENCLOSED

ALI SADR  
6445 ROCK FOREST DR  
APT 209  
BETHESDA MD 20817-8802

HSBC CARD SERVICES  
PO BOX 5255  
CAROL STREAM IL 60197-5255



00552451000056000005451984665739288001402





HSBC PREMIER WORLD MASTERCARD



HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6573-9288  
From November 27, 2012 to December 28, 2012

Page 2 of 2

Interest Charged		Amount
Description of Interest Charge		
INTEREST CHARGE ON CASH ADVANCES		\$0.00
INTEREST CHARGE ON PURCHASES		\$0.00
INTEREST CHARGE ON BALANCE TRANSFERS		\$0.00
<b>Total Interest For This Period</b>		<b>\$0.00</b>
<b>2012 Totals Year to Date</b>		
Total fees charged in 2012		\$125.00
Total interest charged in 2012		\$226.15

Interest Charge Calculation			
Type of Balance	Annual Percentage Rate (APR)	Balance Subject to Interest Rate	Interest Charge
PURCHASES 00001	27.24% (v)	\$0.00	\$0.00
CASH ADVANCES 80001	27.24% (v)	\$0.00	\$0.00
BALANCE TRANSFER 71111	27.24% (v)	\$0.00	\$0.00

*v=Variable Rate*

HSBC PREMIER REWARDS Summary			
Previous Points	175,718	Points	5,325

Travel on your terms. HSBC Premier World MasterCard travel rewards have no blackout dates, booking fees or seating restrictions

Total Points 181,243

Customer News	
Whether you're shopping in Bhutan or Bermuda, you pay no Foreign Transaction Fees with the HSBC Premier World MasterCard. So wherever you travel, be sure to travel with your Premier credit card.	



HSBC PREMIER WORLD MASTERCARD

HSBC Premier World MasterCard Account Statement  
Account Number 5451-9846-6573-9288  
From December 28, 2012 to January 28, 2013

Summary of Account Activity	
Previous Balance	\$5,524.51
Payments	\$0.00
Other Credits	\$0.00
Purchases/Debits	\$1,909.90
Balance Transfers	\$0.00
Cash Advances	\$0.00
Past Due Amount	\$56.00
<b>Fees Charged</b>	<b>\$25.00</b>
<b>Interest Charged</b>	<b>\$168.06</b>
New Balance	\$7,627.47
Revolving Credit Limit	\$11,500.00
Revolving Credit Available	\$3,872.53
Statement Closing Date	January 28, 2013
Days in Billing Cycle	31

Payment Information		
New Balance	\$7,627.47	
Minimum Payment Due	\$326.00	
Payment Due Date		February 22, 2013
<b>Late Payment Warning:</b>	If we do not receive your minimum payment by the date listed above, you may have to pay a late fee of up to \$25.00 and your APRs may be increased to the Penalty APR of 27.24%.	
<b>Minimum Payment Warning:</b>	If you make only the minimum payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:	
If you make no additional charges using this card and each month you pay...	You will pay off the balance shown on this statement in about...	And you will end up paying an estimated total of...
Only the minimum Payment	23 Years	\$23,235
\$312	3 Years	\$11,245 (Savings = \$11,990)

If you would like information about credit counseling services call 1-866-569-2227.

**Questions?**

24-Hour Customer Service 1-888-662-4722  
 Lost or Stolen Card 1-800-327-4214  
 Outside USA Collect 1-716-841-6866  
 TDD/Hearing Impaired 1-800-655-9392

**Payment Address:** HSBC Card Services, PO Box 5255, Carol Stream, IL

60197-5255

**Billing Inquiries:** HSBC Card Services, PO Box 80029, Salinas, CA

93912-0029

**Manage Your account online** at [www.HSBCPREMIERUSA.com](http://www.HSBCPREMIERUSA.com)**Important Information**

As a reminder, you may pay your credit card bill online or through our automated phone system for no fee.

Transactions					
Purchases/Debits					
Trans Date	Post Date	Description of Transaction or Credit	Purchase Type	Reference Number	Amount
12/31/12	01/01/13	SMARTSHEET 4252831870 WA		MT130010119000010111139	\$1,192.00
01/02/13	01/04/13	MARRIOTT 337P9 F&B BETHESDA MD		MT130040121000010177626	
		MRCH INV#: 000005451			
		ARRVL DT: 010213 DPRT DT: 010213			
		MRCH PH: 3018975600			
		PROPERTY PH: 3018975600			
		<b>Transaction Total</b>			<b>\$8.63</b>
01/04/13	01/05/13	HAIR CUTTERY #1828 BETHESDA MD		MT130050123000010109903	\$20.00
01/04/13	01/07/13	THE NORTH FACE #48 BETHESDA MD		MT130070113000010513107	\$518.39
01/04/13	01/07/13	CVS PHARMACY #1479 Q03 BETHESDA MD		MT130070113000010528647	\$70.39
01/04/13	01/07/13	TYSON'S SUPER CLEANERS VIENNA VA		MT130070116000010198933	\$13.50

Detach and return bottom portion with your payment.

140850 4 27 0000000411 STMT166 D 8 492 PME1

See reverse side for important information



Account Number: 5451-9846-6573-9288  
 New Balance \$7,627.47  
 Minimum Payment Due \$326.00  
 Payment Due Date 02/22/2013

Include account number on check to HSBC Card Services. Do not send cash. Please send your payment 7 to 10 days prior to the payment due date to ensure timely delivery.

140 AMOUNT  
ENCLOSED

ALI SADR  
 6445 ROCK FOREST DR  
 APT 209  
 BETHESDA MD 20817-8802

HSBC CARD SERVICES  
 PO BOX 5255  
 CAROL STREAM IL 60197-5255



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